ATTACHMENT 11

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Franklin Post Office Project
Addendum
City of Napa, Napa County, California

State Clearinghouse Number 2010042043

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Table of Contents

List of Exhibits

SECTION 1: INTRODUCTION

1.1 - Overview

This Addendum is being prepared for the Franklin Station historic rehabilitation project (the "Franklin Station Project" or the "Project"), which is located within the City of Napa's Downtown Napa Specific Plan ("DNSP") area. As described in more detail in Section 2, The Project proposes a General Plan Amendment, Specific Plan Amendment, Certificate of Appropriateness, a Development Agreement, Zoning Amendments, and a Planned Development Overlay that includes revised development regulations and the adoption of revised downtown and historic guidelines adapted specific to the Project. Subsequent project approvals would include Major Design Review and a Tentative Parcel Map. If approved, the Project would permit the processing for the development of a maximum 163-room luxury hotel with associated restaurant, retail, bar, and other hotel amenities, and allow the processing for development of an automated parking structure not to exceed 60' in height with ancillary improvements, including up to 7,000 square feet of ground floor retail/restaurant/commercial space.

The Franklin Station Project includes the rehabilitation of the former Franklin Station Post Office building, which was severely damaged by the South Napa Earthquake on August 24, 2014. The Post Office Parcel, including the Franklin Station Post Office building, is listed in the National Register of Historic Places and is the subject of a memorandum of understanding between the United States Postal Service and the California State Historic Preservation Officer. The historic Franklin Station Post Office building is located on a 0.66 acre parcel at 1351 Second Street, Napa, California, ("**Post Office Parcel**"). The Project would also include an approximately 0.34 acre property containing the Zeller Ace Hardware Store building located at 819 Randolph Street, Napa, California ("**Ace Parcel**"), and also includes the approximately 0.45 acre property and the surface parking lot thereon located at the southeast corner of Randolph Street and Second Street in Napa, ("**Parking Lot Parcel**"). The Post Office Parcel, the Parking Lot Parcel, and the Ace Parcel together comprise approximately 1.45 acres of land and are referred to herein collectively as the "**Property.**"

The Project is fully described in Section 2 of this Addendum.

This Addendum and accompanying analysis have been prepared to evaluate the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.) and the CEQA Guidelines (California Administrative Code, Title 14, Section 15000, et seq.) to determine whether the Project is within the scope of the development program described in the DNSP and evaluated in the Downtown Napa Specific Plan Program Environmental Impact Report (the "DNSP EIR" or "EIR") (State Clearinghouse No. 2010042043), and whether the Franklin Station Project has the potential to result in any new environmental effects that were not identified and addressed in the DNSP EIR.

1.2 - Agency Role

City of Napa—Lead Agency: By virtue of the proposed Franklin Station Project being located in the Downtown Napa Specific Plan ("DNSP" or "Specific Plan") area and within the Napa city limits, the City of Napa is the agency with principal authority for carrying out and approving the proposed project. In accordance with its role as the Lead Agency, the City of Napa was responsible for preparation and certification of the DNSP EIR.

1.3 - Purpose and Background

This Addendum has been prepared in accordance with the Section 15168 of the CEQA Guidelines and updates the DNSP EIR, which was certified by the Napa City Council in Resolution R2012 54, adopted on May 1, 2012. The purposes of this document are to inform the decision-making body and other organizations and interested persons of the scope of the proposed project, its potential environmental effects and the possible measures to reduce potentially significant environmental impacts; to enable the City to consider environmental consequences when deciding whether to approve the proposed project; and to satisfy the substantive and procedural requirements of CEQA.

The DNSP EIR was a "Program" EIR, which is defined by CEQA Guidelines Section 15168 as:

(a) **General.** A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
(1) Geographically,
(2) As logical parts in the chain of contemplated actions,
(3) In connection with issues of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Pursuant to CEQA Guidelines Section 15168(c), Program EIRs may be used for subsequent activities contemplated in the Program EIR. CEQA Guidelines Section 15168(c) states:

(c) **Use with Later Activities.** Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
(1) If a later activity would have effects that were not examined in the program EIR, a new study would need to be prepared leading to either an EIR or a negative declaration.
(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.
(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.

(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.

(5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

The DNSP EIR describes the future use of the EIR for subsequent activities, implementation and development. It states:

> This EIR may be used for the following direct and indirect actions within the Planning Area[1]:
>
> **City of Napa**
>
> The Downtown Specific Plan will be presented to the City of Napa Planning Commission for comment, review and recommendations. The City of Napa City Council, as the City's legislative body, is the approving authority for the Specific Plan. As part of the Plan's approval, the City Council would take the following actions:
>
> - Certify of the Downtown Napa Specific Plan Program EIR.
> - Adopt required findings for the above actions, including required findings under the CEQA Guidelines, Sections 15090, 15091 and 15093.
> - Adopt the Downtown Napa Specific Plan.
> - Adopt a Mitigation Monitoring and Reporting Program (MMRP).
>
> Subsequent actions that may be taken by the City Council regarding the project include, but are not limited to, the following:
>
> - Amendment of the City of Napa General Plan and Land Use Designation Map
> - Amendment of the City of Napa Municipal Code and Zoning Maps so that the city zoning maps and the Specific Plan land use policy map are consistent.
> - Implementation of financing programs or fee programs for public facilities.
> - Approval of subsequent development applications.
> - Approval of subsequent public facility and roadway improvement projects.
>
> (DNSP Draft EIR at 3-17, 18. (Emphasis added to bullet point for this Addendum to highlight use of the DNSP EIR for this Project))

The analysis and conclusions contained herein have been provided to assist the City of Napa in providing the appropriate level of environmental review necessary in accordance CEQA Guidelines Section 15168. CEQA Guideline 15168 relies upon an analysis required under CEQA Guidelines

[1] "Planning Area" is the defined as the Specific Plan Planning Area, which encompasses Downtown Napa, bounded on the east by the eastern bank of the Napa River, on the south by Division and Third streets and on the west by Jefferson Street. The northern boundary generally follows the edge of the "Downtown Commercial" zoning area boundary adjacent to northern residential neighborhoods along Polk and Caymus streets west of Soscol Avenue. The Planning Area boundaries extend east to include the Oxbow Market and former Copia area east of Soscol Avenue. The Planning Area encompasses approximately 210 acres. DNSP Draft EIR at 3-2.

15162 for use of a Program EIR for later activities. CEQA Guidelines Section 15162 provides the following guidance on determining when a subsequent EIR shall be prepared:

(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects of a substantial increase in the severity of previously identified significant effects; or
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As will be discussed in greater detail in Section 4, the site-specific details and operations of the Franklin Station Project do not alter any of the previous conclusions contained in the DNSP EIR, and the Franklin Station Project would not result in any new significant effects that were not discussed in the DNSP EIR, or substantially increase the severity of any significant effects that were identified in the DNSP EIR. Therefore, no new environmental document is required under CEQA Guideline Section 15168. This Addendum has been prepared pursuant to CEQA Guideline Sections 15168 and 15164 to document the evaluation of the Franklin Station Project's site-specific operations and impacts and describe how the City of Napa determined the environmental effects of the Project were covered in the DNSP EIR.

1.4 - Background Discussion

On January 27, 2012, the City of Napa (Lead Agency) released for public review a Draft Environmental Impact Report (Draft EIR) for the City's proposed Downtown Napa Specific Plan (State

Clearinghouse No. 2010042043). The minimum 45-day public review and comment period on the Draft EIR began on January 27, 2012, and closed on March 12, 2012. The Napa City Council certified the DNSP EIR on May 1, 2012. (Herein, the Certified Final EIR, Draft EIR and all technical appendices and documents incorporated therein are referred to as the "EIR" or "DNSP EIR.")

The EIR evaluated the potential environmental effects from the adoption and implementation of the DNSP, based on the information available to the City at that time. This Addendum provides a description of the DNSP EIR analysis as well as a site-specific description of the Franklin Station Project. Consistent with CEQA Guideline Section 15168 and the DNSP EIR, this Addendum is being used for the environmental analysis of the Franklin Station Project, a subsequent development application which is a direct action within the Planning Area (Exhibit 1).

This Addendum documents the City's evaluation of the Franklin Station Project to describe how the City determined that the Franklin Station Project is within the scope of the development program described in the DNSP and evaluated in the DNSP EIR and will not result in any new environmental effects not identified and addressed in the DNSP EIR or substantially increase the severity of any effects identified in the DNSP EIR.

Each topical section of the EIR was reviewed and analyzed to determine if the site-specific changes related to the Franklin Station Project would result in new, significant environmental effects or more severe environmental impacts than those previously analyzed and disclosed in the EIR. The EIR evaluated the potential environmental impacts that could result from the approval of the DNSP, and in particular, it focused on potentially significant impacts, mitigation measures, and alternatives intended to mitigate or avoid the potentially significant impacts arising from the implementation of the DNSP.

1.5 - Summary of Findings

Based on the analysis contained in Section 4, the City has determined that the Franklin Station Hotel Project is within the scope of the Program that was evaluated in the DNSP Program EIR and will not result in any new or significant environmental effects or a substantial increase in the severity of previously identified significant effects. Pursuant to CEQA Guidelines Section 15168(c)(2), no new environmental document is required for the Franklin Station Hotel Project. The City is adopting this addendum to document the above determinations.

1.6 - Format of Addendum

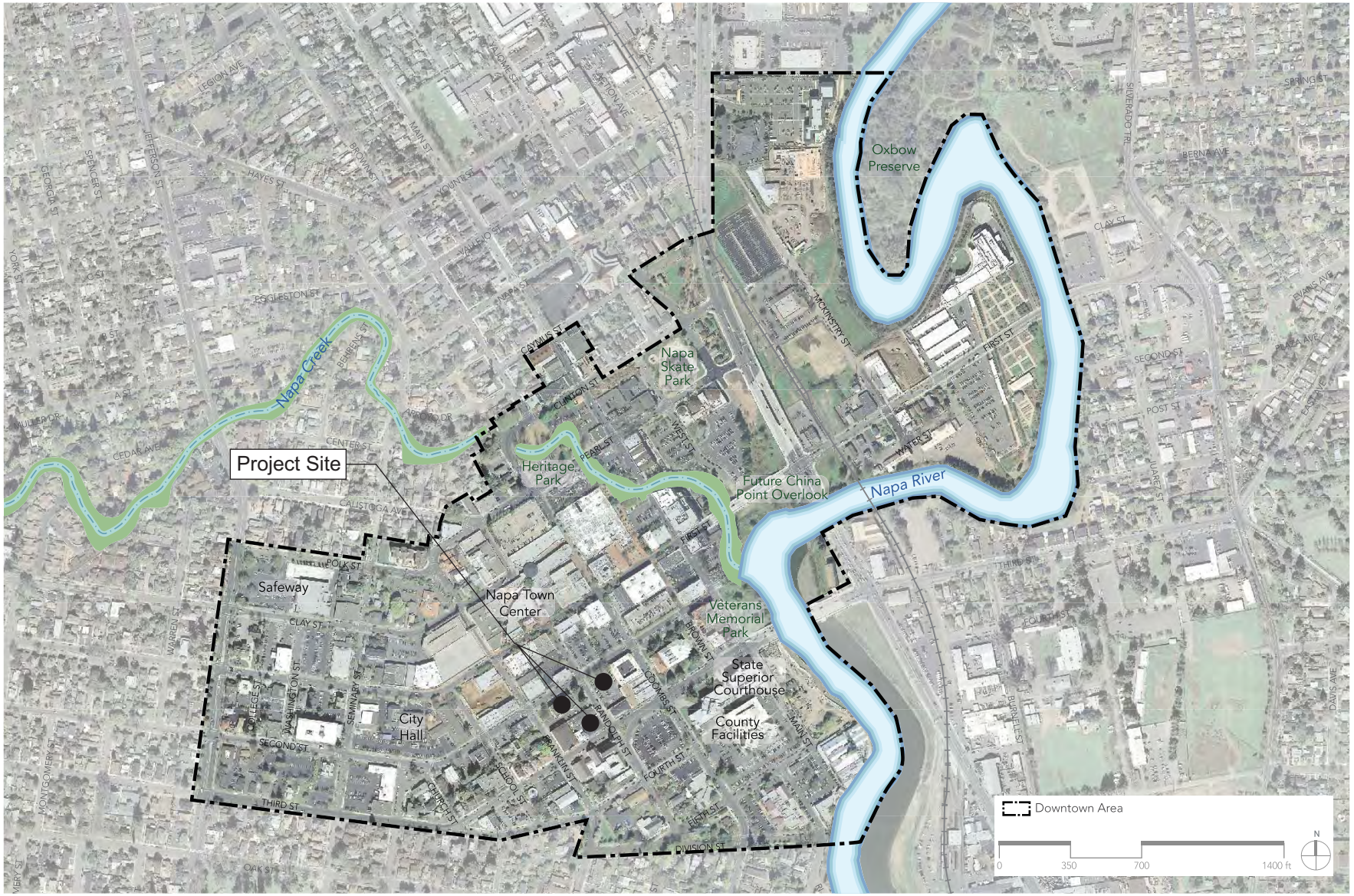
The previously certified EIR provides program-level environmental information to support subsequent review of entitlement actions and development proposals. This Addendum provides additional clarification and information about potential impacts that could result from the approval of the Franklin Station Project. This Addendum also provides a brief summary of the impact analysis found in the EIR and should be read together with the full text of the EIR.

The contents of this Addendum are:

- Section 1, Introduction, describes the CEQA process and the organization of this Addendum.

- Section 2, Project Description, describes the Franklin Station Project in the context of the DNSP, the project location, site specific operations and key characteristics of the Franklin Station Project.
- Section 3, Summary of Environmental Conclusions.
- Section 4, Environmental Setting, Impacts, and Mitigation Measures, contains a discussion of the setting and the environmental impacts that could result from the Franklin Station Project relative to the impacts analyzed in the DNSP EIR. The section also identifies the applicable mitigation measures from the DNSP EIR that would reduce or eliminate these adverse impacts.
- Section 5, Mitigation Monitoring and Reporting Program, lists the mitigation measures, implementation procedures, monitoring responsibility, monitoring and reporting action, monitoring schedule and verification of compliance from the DNSP EIR. It is included to identify the specific mitigation measures required under Section 4.
- Section 6, Report Preparation, identifies persons and documents consulted during preparation of the Addendum.
- Appendices contain the supporting documents and technical information for the impact analyses are presented in Appendices A and B.

All reference documents are available for review by the public. Documents are available at the City of Napa, 1600 First Street, Napa, CA 94559.



Source: Final Downtown Napa Specific Plan.

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Exhibit 1
Downtown Specific Plan Planning Area

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SECTION 2: PROJECT DESCRIPTION

2.1 - Downtown Napa Specific Plan (DNSP)

The DNSP provides a blueprint for guiding future development and investment within Napa's historic downtown to support the community's vision for an attractive, vibrant and pedestrian-oriented city center. The plan outlines future land use, development standards and multi-modal circulation within the downtown and provides an implementation action plan to achieve its key objectives.

The DNSP area encompasses approximately 210 acres and is bounded on the east by the eastern bank of the Napa River, on the south by Division Street and Third Street, and on the west by Jefferson Street; refer to Exhibit 1. The northern boundary generally follows the edge of the residential neighborhoods along Polk Street and Caymus Street west of Soscol Avenue, while the eastern boundary extends east to include the Oxbow Market and the former Copia area east of Soscol Avenue.

The DNSP area includes a diverse mix of land uses, including residential, lodging, retail, restaurant, office and civic uses. Most of the downtown core, west of Soscol Avenue, is a diverse range of commercial uses ranging from small, local shops and restaurants to larger-format retail. Office uses are spread throughout downtown, although several historic residential structures have been converted to office uses south of the commercial core. The DNSP also contains several public facilities, including City and county administrative offices, the County Courthouse, and the Napa Library. There are approximately 125 housing units within the Planning Area, consisting primarily of single-family houses, condominiums, and apartments. Residential neighborhoods are adjacent to downtown on the south, north, east, and west.

Six land use designations were established with the adoption of the DNSP. New development projects are required to follow the policies, programs and guidelines set forth in the DNSP. The DNSP outlines development standards that would shape the form and character of development within Downtown by promoting coordinated and cohesive site planning and design. There are three Building Form Zones in the Planning Area shown in Exhibit 2:

- **Downtown I Zone** would allow the most intensive development at the very center of downtown, north of First Street and running from the intersection of First Street and Main Street west to School Street.
- **Downtown II Zone** encompasses most of downtown except for the core and edges and all of the land east of Soscol Drive. The zone would allow medium- to high-density development designed to support uses located in the heart of the downtown area.
- **Transition Zone** encompasses blocks or half-blocks between the downtown core and the sensitive lower-scale residential neighborhoods surrounding downtown. Generally, the southern and western blocks are characterized by the downtown Neighborhood land use district, while the northern blocks are characterized by Mixed-Use and Downtown Core Commercial land use districts.

Downtown is a historic, pedestrian oriented district within which opportunities exist for future public and private development, including reuse of existing historic buildings, redevelopment of existing parcels, and new infill development. Future development is anticipated to include residential, retail, office, hotel, and flex space that may be used for residential, retail, or office use. The DNSP addressed development within the Planning Area through 2035. In accordance with CEQA, the DNSP EIR contained a description of the DNSP, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives.

The DNSP EIR is an informational document that informed the general public, the local community, responsible and interested public agencies, the decision-making body and other organizations, and interested persons of the scope of the DNSP, its potential environmental effects, possible measures to reduce potentially significant environmental impacts, and alternatives that could reduce or avoid the significant effects. The alternatives to the proposed project that were analyzed, with the exception of the mandatory No Project Alternative, were selected due to their potential to achieve basic project objectives and to lessen or avoid significant environmental effects of the proposed project discussed in the EIR.

The comprehensive range of development scenarios analyzed included:

- Increasing potential residential units from 125 units to 642 units; an additional 470,600 square feet of office space, 303 hotel rooms, a conference center, and 108,590 square feet of additional retail space over existing development.
- The above development would be reduced by 25 percent, with the exception of number of hotel rooms.
- Decreasing the above residential development by 25 percent and office development by 40 percent, the number of hotel rooms would remain the same.
- A total of 503 hotel rooms, with a reduction of 167,000 square feet of office space; retail space permitted would remain at 108,590 square feet, and the increase on the number of residential units would remain at 642 units.
  - Completion of DNSP EIR provided the City with an analysis of impacts for a range of development including, but not limited to, increasing the potential residential units from 125 units to 642 units, adding 470,600 square feet of office space, 303 hotel rooms, a conference center, and 108,590 square feet of additional retail space over existing development capacity under the General Plan, or a total of 503 hotel rooms, with a reduction of 167,000 square feet of office space; retail space permitted would be 108,590 square feet and an increase on the number of residential units allowed would be 642 units.

2.2 - Project Overview

The Franklin Station Project is located on Post Office Parcel at 1351 Second Street, the Ace Parcel located at 819 Randolph Street, and the Parking Lot Parcel located at the southeast corner of Randolph Street and Second Street, Napa, California. This is a part of the Downtown Mixed Use

(DMU) and Downtown Public (DP) Zoning Districts and it is located in the Downtown II Zone where commercial development should be focused. Exhibit 3 depicts the location of the project site.

The Project approvals required from the City of Napa include a General Plan Amendment, Specific Plan Amendment, Certificate of Appropriateness, a Development Agreement, and Zoning Amendments to rezone the Post Office Parcel from DP to DMU/PD (Planned Development Overlay), the Parking Lot Parcel from DMU to DMU/PD, and the Ace Parcel from DMU to DMU/PD. Subsequent project approvals would include Major Design Review and a Tentative Parcel Map.

Following the rezoning and Planned Development Overlay, the Project would be located entirely within the Downtown Mixed Use District of the DNSP. As stated in the DNSP on page 56:

> The Downtown Mixed-Use land use designation and zoning district provides for retail uses; administrative and other offices; institutional, recreational, entertainment, arts and cultural uses; hotels and conference facilities; transportation facilities; and public and quasi-public uses that strengthen Downtown's role as the community's center.

Retail uses and food service are permitted within the DMU, and hotels are conditionally permitted. This Project would allow through the PD up to a 163 key hotel (with up to 25 percent of the development as condo-hotel[2] and 25 percent as accessory whole ownership dwelling units[3]) as a permitted use, along with off-site principal use parking to serve the hotel with 65 public spaces. Under the proposed PD, the Project, including the hotel use would be permitted outright, eliminating the need for a conditional use permit. Standards for development are detailed in the DNSP and have been incorporated into the Project, along with additional standards in the proposed PD and guidelines. The Project is fully encompassed within the DNSP Area and is consistent with the development intensity considered in the DNSP.

The Project would include the removal of approximately 4/5^{ths} of the Post Office structure from the site, leaving the identified historic features of the building front to a depth equal to and inclusive of the depth of the existing interior lobby. The Franklin Station Project also would involve new construction. The new construction would include adaptive reuse and rehabilitation to the remaining Post Office Structure that would include an addition to the retained portion of the building located behind the structure. The addition would be allowed to be taller than and wider

[2] Condo-Hotel is defined by City of Napa Municipal Code as a facility meeting the definition of a hotel with ownership structured as a condominium, cooperative or other ownership/financing arrangement found by the Community Development Director to be similar in function and/or operation, but shall not include timeshares in or interval or fractional ownership of a hotel. The City of Napa regulates Condo-Hotels under the City of Napa Municipal Code Section 17.52.095.

[3] If approved, the PD would allow up to 25percent of the total hotel units shall be allowed to be used as whole ownership dwelling units accessory to the hotel that could be used for full or part-time residential occupancy in addition to transient occupancy. Whole ownership dwelling units are accessory uses to an approved hotel use. Such units are owned by third parties and can be used for residential occupancy or rented as hotel rooms at the election of the owner through a contractual relationship between the hotel operator and the owner. Under this contract, if they are rented as hotel rooms, the hotel operator would manage the rental as it would any of its other hotel rooms, and if they are used by the owner for residential occupancy, they would be occupied by the owner with services and amenities provided by the hotel. Such units are known in the hotel industry as "branded residential" units. By example, accessory whole ownership dwelling units are allowed by the Napa Municipal Code at the Stanly Ranch Resort by the Stanly Ranch Resort Master Plan under Chapter 17.30 of the Napa Municipal Code (see Section 17.30.040.B.3).

than the resource, up to the City height limits and property setbacks. The new construction would also include the parking structure.

In addition, the Project is located within the City's Parking Exempt District; thus, no on-site parking is required for non-hotel commercial uses. The project would construct an automated parking structure on the Parking Lot Parcel that includes parking for the hotel use within the Project and no fewer than 65 public parking spaces to replace the 55 public parking spaces currently on the Parking Lot Parcel.

2.2.1 - Construction Schedule

With City approvals, construction of the Franklin Station could start as soon as 2020, with the hotel opening as soon as 2022. Under the proposed Development Agreement, the Project is anticipated to start construction no later than 2023 and be completed no later than 2026, subject to certain extensions.

2.3 - Project Site and Proposed Hotel Project Rezone

For over 80 years prior to the South Napa earthquake, the U.S. Post Office Franklin Street Station was the main post office serving Napa. The Post Office was built in 1933 with funding from the Public Works Administration. Architect William H. Corlett designed the Art Deco building. The post office was added to the National Register of Historic Places on January 11, 1985. The Post Office Parcel was developed with 7,553 square feet of ground floor area, 8,012 square feet of existing basement area, 906 square feet of mezzanine and 1,543 square feet of second floor area.

On August 24, 2014, at 3:20 in the morning, the strongest earthquake in 25 years in the Bay Area shook Napa. At 6.0, the event was the largest earthquake since the 1989 Loma Prieta earthquake. The 2014 South Napa Quake damaged residences and commercial buildings, and it did significant damage to Napa's historic buildings. According to City reports, 156 commercial and residential structures were red-tagged and 1,398 were yellow-tagged. The estimate for damage to the City's infrastructure reached $57.9 million. The Franklin Street Station Post Office experienced significant damage as a result of the South Napa Earthquake. The United States Postal Service estimated that the damage to the building would cost $8 million in repairs to make the building functional again for Post Office purposes. Following the earthquake, the Postal Service planned to demolish the building. While the Postal Service said that it would cost $8 million to repair quake damage, it would cost only $500,000 for demolition.

The Ace Parcel is developed with 7,150 square feet of ground floor area. The Parking Lot Parcel is developed with 55 surface parking stalls.

The Properties current zoning designations are:

Franklin Station Parcel	
Location	1351 Second Street, Napa, CA 94559
Lot Size	28,819 square feet

Franklin Station Parcel	
General Plan	Downtown Specific Plan
Zoning	Downtown Public
Zone	Downtown II
Floor Area Ratio (FAR)	4.0
Height	60 feet

Ace Parcel	
Location	819 Randolph Street, Napa, CA 94559
Lot Size	14,780 square feet
General Plan	Downtown Specific Plan
Zoning	Downtown Mixed-Use
Zone	Downtown II
FAR	4.0
Height	60 feet

Parking Lot	
Location	SE corner of Randolph Street and Second Street, Napa, CA 94559
Lot Size	19,687 square feet
General Plan	Downtown Specific Plan
Zoning	Downtown Mixed-Use
Zone	Downtown II
FAR	4.0
Height	60 feet

The Development Agreement and PD would provide modify the existing zoning and development parameters and establish the right to develop, subject to approval of final design in the Major Design Review, the following in conjunction with the hotel use.

Zoning	Downtown Mixed-Use
Zone	Downtown II
FAR	4.0
Maximum Height	60 feet
Maximum FAR	4.0

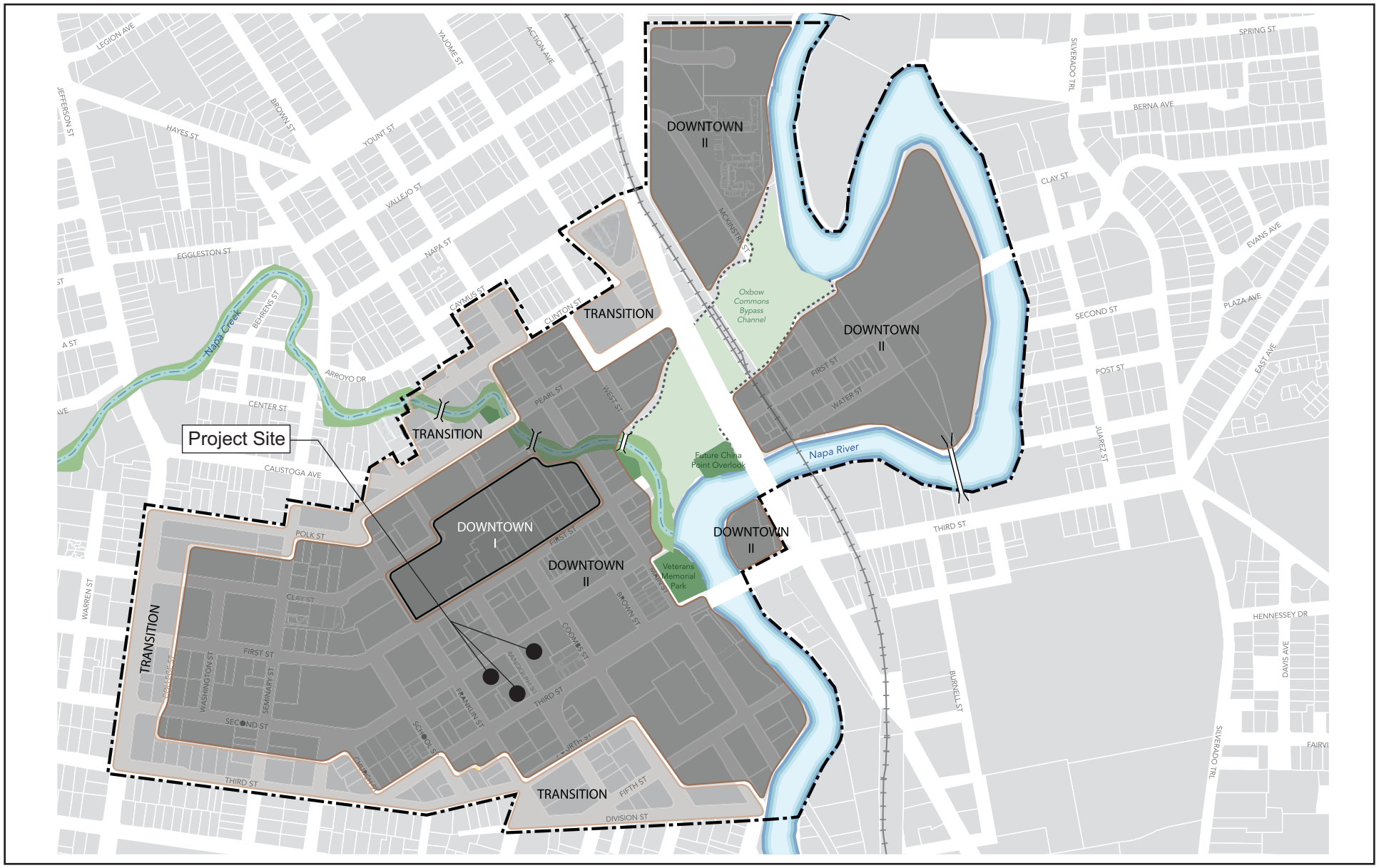
Units/Key:	163
Total Development Area	174,396 square feet (not including parking site) Plus 78,748 square feet parking/retail structure
Parking	228 (including 65 public stalls) Automated system
Condo Hotel Units	Up of 25 percent of the units
Resort Residential	Up to 25 percent of the units

The hotel proposed as part of the Franklin Station Project proposes to be an upscale or luxury boutique hotel.

The three properties comprising the proposed development are located within the Downtown II Building Form Zone, which allows medium to high density development. The three subject parcels currently have a development potential of 4.0 Floor Area Ratio (FAR) within the DNSP. The proposed General Plan Amendment and DNSP Zoning Amendment associated with the proposed development would have no bearing on the development potential of the properties as the 4.0 FAR will remain as the maximum development potential and general height limits and setbacks would remain as currently designated for the site. As such, the Project's proposed General Plan Amendment, Specific Plan Amendment, Zoning Amendments and Planned Development Overlay do not propose a substantial departure from the existing zoning controls in the DNSP. The changes proposed by the Project would still be within the levels of development already contemplated by the DNSP for the DMU and DP Districts within Downtown II Building Form Zone applicable to the site and evaluated in the DNSP EIR, which would include aspects of the DNSP intended to mitigate environmental effects. The Post Office Portion of the Project site was not zoned DMU at the time of the DNSP adoption because it was a government use not expected to change. However, following the 2014 earthquake, the federal government decided to discontinue the governmental use and relocate the Post Office services, providing an opportunity for adaptive reuse of the Post Office property. The DNSP did not anticipate or require the sites on which the Project would be located to be used for any residential or other specific use. Therefore, the Project would not conflict with any other use planned for the site. As such, the future development proposed by the Project is planned to result in cohesive Downtown core commercial area within the Downtown Planning Area.

2.4 - PD and Guidelines Overview

The DNSP contains standards and design guidelines applicable to development projects located within the Planning Area. The Project Application was filed in May 2017 including a PD with standards and additional guidelines intended to ensure the Project's conformance to those DNSP standards and design guidelines applicable to the Project. Ultimately, conformance with the DNSP standards and guidelines are determined by the Planning Commission and City Council for the City of Napa.



Source: Final Downtown Napa Specific Plan.

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Exhibit 2
Building Form Zones

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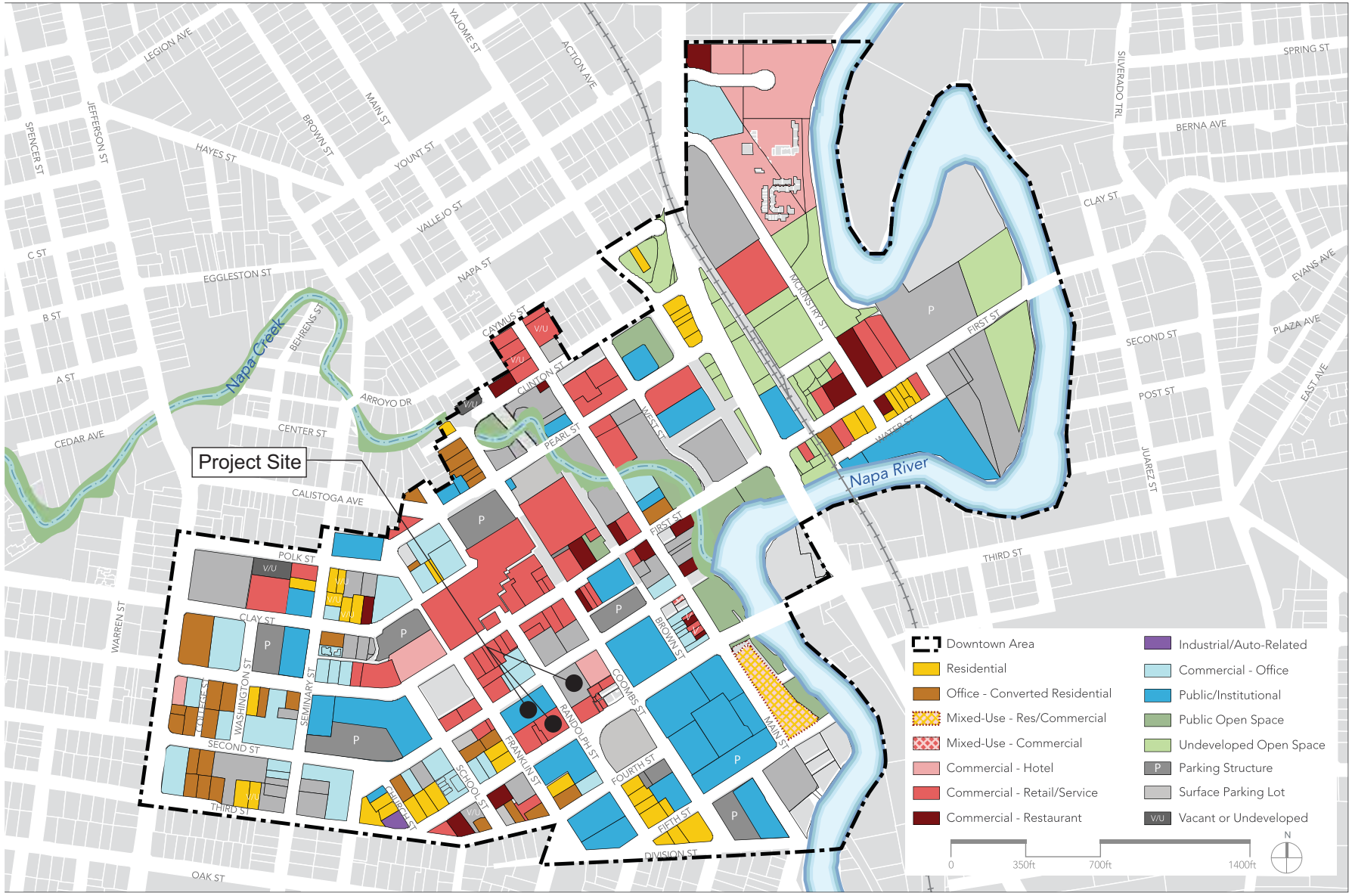

Source: Final Downtown Napa Specific Plan.

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Exhibit 3
Existing Land Use

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According to the application materials, key use and design considerations for the Project include:

- The hotel building should relate to the street and surrounding neighborhood with design elements that activate the street and provide a pleasant pedestrian experience.
- Select building materials, architectural details and finishes should convey a sense of permanence. Quality materials should be used to withstand the test of time regardless of architectural style. Approach character-defining details in a manner that is true to a style of architecture or common theme.
- Activate upper-story step back areas of the hotel building with balconies, roof gardens or similar features.
- Non-historic elevations of the hotel building shall provide high quality, durable materials and attention to detail. Buildings shall provide a human scale and facilitate pedestrian activity. Pedestrian oriented features, such as outdoor seating, are encouraged to enliven the public realm.
- Entries should be substantial and well-detailed. Doors should match the high-quality materials and character of the window design.
- The hotel building shall be enhanced with architectural elements such as porches, stoops, bay windows, balconies, eaves, brise-soleil, or massing articulation at the non-historic building corners. Façade materials shall turn the corner to employ the same vocabulary of materials.
- Corner buildings shall have consistent material treatments on front and exposed side facades.
- Frame south-facing and southwest-facing windows with protruding vertical or horizontal shading devices such as lintels, sills and awnings to provide adequate protection from glare. Windows and doors with real mullions are required to create shade and shadow (i.e., no inserts or mullions set inside the glass).
- Break up the mass of the hotel building with articulation in form, architectural details, and changes in materials and colors.
- Incorporate architectural elements and details, such as adding notches, grouping windows, adding loggias and dormers, varying cornices and rooflines.
- Vary materials and colors to enhance key components of a building's façade, such as with window trim, entries and projecting elements.
- Use articulation in form including changes in wall planes, upper-story building step backs and/or projecting or recessed elements.
- The Third Street elevation should emphasize and feature a welcoming main entrance and be designed according to simple and harmonious proportions in relationship to the overall size and scale of the building. Ensure that the pedestrian entry provides shelter year-round.
- The hotel building shall provide entrances and entry approaches from Second and Third streets that can accommodate persons of all mobility levels.

- Service and maintenance areas should be accessed from interior drives or corridors, but where necessary fronting on a public street they shall be set back and screened from public view to provide a quality pedestrian experience.
- Balconies and decks should be well detailed with high quality, durable materials and attention to the method of joinery.
- Special attention should be paid to the first three floors of the hotel building to maximize opportunities to engage the pedestrian and enable an active and vibrant street front.
- Hotel balconies up to six feet in depth are encouraged and can be either recessed or protruding. Where Juliet balconies are proposed, the windows behind the balcony shall be full length to convey appearance of doors.
- The hotel building should be designed without large uninterrupted expanses of wall surface. Where 15 feet or more of windowless wall is found to be unavoidable, eye-level displays, a contrast in wall treatment, outdoor seating, and/or planting shall be used to enhance visual interest and pedestrian area vitality.
- Awnings are recommended along street frontages, particularly where there are doorways.
- The hotel building shall utilize architectural elements such as cornices, lintels, sills, balconies and awnings to enhance building façades.
- The shape, size, color, and material of projections for shade protection should be consistent with the architectural style/character of the building. The minimum dimensions of awnings should be consistent with the width of the glazing.

Regarding the parking structure design, the Project includes the following guidelines:

- The parking structure facades should complement nearby buildings by incorporating architectural elements (e.g., window and door design, varied building materials, decorative treatments, etc.) to provide visual interest and a strong urban form.
- Retail space in the parking structure shall incorporate recessed entries. The depth of recessed entries shall be proportional to the size of the entrance.
- Retail space in the parking structure shall incorporate recessed entries. The depth of recessed entries shall be proportional to the size of the entrance.
- The parking structure should vary and articulate the building façade to add scale and avoid large monotonous walls.
- The exterior walls of the parking structure provide an opportunity for public art, murals, or other creative way to enhance the City's sense of place.
- Create safe walkways and visual connections to the parking structure. Provide ample lighting in and around the parking structure to enhance safety.
- Access points to the parking structure should be as unobtrusive as possible and should not detract from the pedestrian orientation of Downtown.

The proposed historic guidelines include:

- Conserve the cornice extending from the roofline formed of terracotta rams and cow heads, along with the ornamentation that consists of decorative brickwork and terracotta panels in a geometric motif.
- Retain Art Deco/WPA Moderne details, including fluted pilasters and stylized terra cotta eagle panels above each door.
- Retain the monolithic windows on the main façade.
- Retain the bronze and milk glass urn-shaped light fixtures adjacent to the entryways.
- Retain the seven piers topped by a terracotta capital in a stylized floral motif.

The PD and the Design and Historic Guidelines for the Franklin Station Project have been created to be in conformance with the DNSP. These design guidelines are intended to modify and be additive to the guidelines contained in the DNSP, including the Historic Design Guidelines in Appendix G, and to the site-specific guidelines developed for the Franklin Station Hotel and parking structure. Because the PD and the Design and Historic Guidelines are more detailed and created specifically for the Franklin Station Project, they will control over the DNSP Regulations and Guidelines in the event of a conflict. The potential impacts related to these Project-specific proposed changes in regulations and guidelines are analyzed in Chapter 4 of this addendum. See, for example Section 4 (Aesthetics, Cultural Resources, and Land Use and Planning) for a discussion of impacts related to the proposed changes in regulations and guidelines.

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SECTION 3: SUMMARY OF ENVIRONMENTAL CONCLUSIONS

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Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
1. Aesthetics *Would the project:*					
a) Conflict with City goals and policies related to visual quality, to other applicable aesthetic or visual policies or standards?	Yes	No	No	No	Yes
b) Significantly alter the existing natural viewsheds, including changes in natural terrain or vegetation?	Yes	No	No	No	N/A
c) Significantly change the existing visual quality of the region or eliminate significant visual resources?	Yes	No	No	No	Yes
d) Significantly increase light and glare in project vicinity?	Yes	No	No	No	Yes
e) significantly reduce sunlight or introduce shadows in areas used extensively by the public?	Yes	No	No	No	Yes
2. Air Quality and Greenhouse Gases *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?	Yes	No	No	No	Yes
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Yes	No	No	No	Yes
c) Result in a cumulatively considerable net increase of any nonattainment pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?					
d) Expose sensitive receptors to substantial pollutant concentrations?	Yes	No	No	No	Yes
e) Create objectionable odors affecting a substantial number of people?	Yes	No	No	No	Yes
f) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Yes	No	No	No	Yes
g) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Yes	No	No	No	Yes
3. Biological Resources *Would the project:*					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	Yes	No	No	No	Yes
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW e or USFWS?	Yes	No	No	No	Yes
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?					
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Yes	No	No	No	Yes
e) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?	Yes	No	No	No	Yes
f) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	Yes	No	No	No	Yes
g) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved plan?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
4. Cultural Resources *Would the project:*					
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	Yes	No	No	Yes	Yes
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	Yes	No	No	No	Yes
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Yes	No	No	No	Yes
d) Disturb any human remains, including those interred outside of formal cemeteries?	Yes	No	No	No	Yes
5. Geology and Soils *Would the project:*					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	—	—	—	—	—
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Yes	No	No	No	N/A
ii) Strong seismic ground shaking?	Yes	No	No	No	Yes
iii) Seismic related ground failure, including liquefaction?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
iv) Landslides?	Yes	No	No	No	N/A
b) Result in substantial soil erosion or the loss of topsoil?	Yes	No	No	No	Yes
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?	Yes	No	No	No	Yes
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Yes	No	No	No	Yes
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Yes	No	No	No	N/A
6. Hazards and Hazardous Materials *Would the project:*					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Yes	No	No	No	Yes
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Yes	No	No	No	Yes
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
waste within one-quarter mile of an existing or proposed school?					
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Yes	No	No	No	Yes
e) Result in a safety hazard for people residing or working in the project area for a project within the vicinity of a private airstrip or within an airport land use plan?	Yes	No	No	No	N/A
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Yes	No	No	No	N/A
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Yes	No	No	No	N/A
7. Hydrology and Water Quality *Would the project:*					
a) Violate any water quality standards or waste discharge requirements?	Yes	No	No	No	Yes
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?					
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	Yes	No	No	No	Yes
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-or off-site?	Yes	No	No	No	Yes
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Yes	No	No	No	Yes
f) Otherwise substantially degrade water quality?	Yes	No	No	No	Yes
g) Place housing within a 100 year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Yes	No	No	No	Yes
h) Place within a 100 year flood hazard area structures that would impede or redirect flood flows?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
i) Expose people or structures to a substantial risk of loss, injury or death involving flooding as a result of the failure of a levee or dam	Yes	No	No	No	Yes
j) Result in inundation by seiche, tsunami, or mudflow	Yes	No	No	No	N/A
8. Land Use and Planning *Would the project:*					
a) Physically divide an established community?	Yes	No	No	No	Yes
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Yes	No	No	No	Yes
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	Yes	No	No	No	N/A
9. Noise *Would the project result in :*					
a) Conflict with land use compatibility guidelines for land uses contained in the Napa General Plan (shown in DNSP EIR Figure 4.I-3); noise levels at new receptors that would be above the "normally acceptable" level are considered to conflict with compatibility guidelines?	Yes	No	No	No	Yes
b) Increased noise along existing and new roadways to levels that exceed 65 L_{dn} ("normally acceptable"), as shown in DNSP EIR Figure 4.I-3?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
c) Exposure of persons or generation of excessive groundborne vibration or groundborne noise levels?	Yes	No	No	No	Yes
d) Exposure of people residing or working in the Planning Area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or a private airstrip?	Yes	No	No	No	N/A
10. Population and Housing *Would the project result in:*					
a) Substantial unanticipated population, housing, or employment growth in excess of local share of regional projections that has the potential to result in adverse physical environmental effects?	Yes	No	No	No	Yes
b) Displacement of existing residents or housing units?	Yes	No	No	No	Yes
11. Recreation *Would the project:*					
a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Yes	No	No	No	Yes
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
12. Transportation *Would the project meet the following guidelines:*					
a) When a signalized intersection operates at midrange Level of Service (LOS) D (as allowed by the General Plan in most locations) or better under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS E or LOS F. The project mitigation should bring the facility to operate at midrange LOS D, at a minimum.	Yes	No	No	No	Yes
b) When a signalized intersection operates at midrange LOS E (as allowed by the General Plan in some locations and for state highway facilities) under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS F. The project mitigation should bring the facility to operate at midrange LOS E, at a minimum.	Yes	No	No	No	Yes
c) When a signalized intersection operates at LOS F (a violation of the General Plan LOS policy) under existing or interim baseline conditions, the addition of more than 50 peak-hour project trips contributes to the continuing operational failure at the intersection. The project mitigation should bring the facility to pre-project conditions.	Yes	No	No	No	N/A
d) At an unsignalized intersection when the minor stop controlled approach operates at LOS E or better or has acceptable operation in terms of	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
total control delay, the addition of project trips increases the total control delay to more than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multi-lane approach. The project mitigation should bring the facility to operate at LOS E or to bring the total control delay to less than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multilane approach, at a minimum					
e) At an unsignalized intersection when the minor stop-controlled approach operates at LOS F and does not have acceptable operation in terms of total control delay, the addition of more than 50 peak-hour trips contributes to the continuing operational failure at the minor approach. The project mitigation should bring the facility to pre-project conditions.	Yes	No	No	No	Yes
f) If the proposed project is on a Crucial Corridor and the property is zoned Traffic Impact Overlay (TI), the project generates more than 520 trips/gross acre/day (or gross floor area equivalent). Uses with higher trip generate characteristics are prohibited unless: i) Adjustments in the gross floor area, gross acreage, operation, etc., are made to reduce the number of trips to an acceptable level as determined by the Public Works Director, or ii) The Public Works Director finds that the transportation benefits of the project clearly outweigh the adverse effect on the crucial	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
corridor. Transportation benefits of the project may include roadway and safety improvements, traffic system management strategies, transit service enhancements, travel demand management strategies, among others.					
g) When operations failures occur under existing conditions, the project shall pay its fair share of the improvements necessary to bring the intersection in compliance with the General Plan LOS policies.	Yes	No	No	No	Yes
13. Utilities and Service Systems *Would the project:*					
a) Result in substantial adverse physical effects associated with the provision of new or physically altered police, fire, or school facilities, or the need for new or physically altered facilities; the construction of which could cause significant environmental impacts in order to maintain acceptable levels of service ratios, response times, or other performance objectives for any of the following services:	—	—	—	—	—
i) fire and police protection	Yes	No	No	No	Yes
ii) schools	Yes	No	No	No	Yes
iii) other public facilities	Yes	No	No	No	
b) Have insufficient water supplies available to serve the project from existing entitlements?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed in Prior Environmental Document(s)?	Does Franklin Station Project Involve New Significant Impacts or Substantially More Serve Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
c) Result in the determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Yes	No	No	No	Yes
d) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Yes	No	No	No	Yes
e) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	Yes	No	No	No	Yes
f) Not comply with federal, State, and local statutes and regulations related to solid waste?	Yes	No	No	No	Yes

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SECTION 4: ENVIRONMENTAL SETTING, IMPACTS, STANDARD CONDITIONS OF APPROVAL AND MITIGATION MEASURES

This Chapter contains a comparative analysis of the potential impacts of the proposed Project with those identified in the DNSP EIR. As provided by Section 15168 of the CEQA Guidelines, this Chapter examines the proposed Franklin Station Project in the light of the DNSP EIR to determine whether an additional environmental document must be prepared for the Franklin Station Project. Because this Addendum demonstrates that the potential environmental effects resulting from the Franklin Station Project were addressed in the DNSP EIR, no new or substantially more severe effects would occur from its implementation, and no new mitigation would be required, the City has determined, pursuant to CEQA Guideline Section 15162, that no new environmental document is required. This Chapter analyzes the above-described Project in relationship to the environmental topics considered in the DNSP, which are set forth below.

4.1 - Environmental Topics

The following subsections in this section analyze the environmental topics as listed below:

- Aesthetics
- Air Quality and Greenhouse Gases
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Recreation and Open Space
- Transportation and Traffic
- Utilities and Service Systems

4.1.1 - Environmental Checklists

Check marks under each environmental category in this analysis indicate whether or not the proposed Project would result in environmental impacts that were not identified and mitigated by the DNSP EIR. The discussion following each environmental category provides information regarding policies that are included in the DNSP that mitigate the potential impacts identified in the DNSP EIR that would apply to the proposed Project. These discussions may also list additional, related General Plan and DNSP policies and refer to other relevant evidence to demonstrate consistency of the proposed Project with the DNSP and determine whether the Project would result in any new significant environmental effects or increase the severity of previously identified environmental effects resulting from implementation of the DNSP.

4.1.2 - Project Information for Comparative Analysis

The Franklin Station Project is located entirely within the DMU and DP Districts, which was part of the Specific Plan Area evaluated in the DNSP EIR. The proposed Franklin Station Project could result in approximately 174,396 square feet of total new commercial development (plus an additional 78,748 sf in the parking structure, which also includes up to 7,000 sf of ground floor retail). This

represents an increase of 157,484 square feet over the 24,212 square feet of existing uses on site. Franklin Station would include up to 163 new hotel rooms permitted outright in the proposed PD (including the condo hotel units and the accessory whole ownership dwelling units).

The three properties comprising the proposed development site are all located within the Downtown II Building Form Zone in the DNSP, which allows medium to high density development. The proposed General Plan Amendment and DNSP Zoning Amendment associated with the proposed development would not change or increase the overall the development potential of the properties as the 4.0 Floor Area Ratio (FAR) will remain as the maximum development potential as currently allowed in the DNSP.

Accordingly, both the hotel and retail development components of the Franklin Station Project are within the levels of development allowed by the DNSP for the DMU and DP Districts and evaluated in the DNSP EIR. The Downtown II Building Form Zone allows for moderately intense development under the DNSP in terms use, height, FAR and scale. No new development beyond what was analyzed in the DNSP EIR would occur. The Project is more fully described in Chapter 2.

4.1.3 - Mitigation Measures

Chapter 5 contains the list of Mitigation Measures from the DNSP EIR. Those Mitigation Measures are the measures referenced in the discussion in this Chapter which apply to the Franklin Station Project as existing Mitigation Measures required by the DNSP EIR. The analysis in this Chapter should be read in reference to the Mitigation Measures citied therein and listed in Chapter 5.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
1. Aesthetics *Would the project:*				
a. Conflict with the City goals and policies related to visual quality, or other applicable aesthetic or visual policies or standards?	☐	☐	☐	☒
b. Significantly alter the existing natural viewsheds, including changes in natural terrain or vegetation?	☐	☐	☐	☒
c. Significantly change the existing visual quality of the region or eliminate significant visual resources?	☐	☐	☐	☒
d. Significantly increase light and glare in the project vicinity?	☐	☐	☒	☐
e. Significantly reduce sunlight or introduce shadows in areas used extensively by the public?	☐	☐	☒	☐

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to visual resources and as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to aesthetics.

The Franklin Station Project proposes "Design Guidelines for the Franklin Station Hotel." These Design Guidelines for the Franklin Station Hotel are intended to be additive to the standards guidelines contained in the Downtown Napa Specific Plan, including the Historic Design Guidelines in DNSP Appendix G, and to the site-specific guidelines developed for the Franklin Station Hotel and parking structure.

As explained below, the Project would not result in any new environmental effects relating to aesthetics that were not identified and addressed in the DNSP EIR.

a) The Project would not conflict with the City goals and policies related to visual quality, or other applicable aesthetic or visual policies or standards.

The DNSP contains standards and design guidelines applicable to development projects located within the Planning Area. The Project Application included specific "Design Guidelines for the Franklin Station Hotel" to be implemented by the city in its Design Review permit process. These Design Guidelines for the Franklin Station Hotel are intended to be additive to the standards guidelines contained in the Downtown Napa Specific Plan, including the Historic Design Guidelines (as proposed to be amended), and to the site-specific guidelines developed for the Franklin Station Hotel and parking structure. The Project is required to address proximate historic resources and to

generally meet the 60' maximum building height standard, subject to certain height limit exclusions allowed by the DNSP and city code, and proposed by the PD. Specifically, the PD exclusions would exclude from the height limit rooftop patios with food and bar service, including restrooms and food and bar service structures. Such exclusions would be required to be accessory to the main use of the site and set back to minimize visibility, and subject to the approval of a Design Review permit. Ultimately, conformance with the DNSP standards and guidelines are determined by the Planning Commission for the City of Napa.

The conformance of the Franklin Station Project's design with the DNSP standards and guidelines and the proposed Design Guidelines for the Franklin Station Hotel includes:

- General conformance with City Zoning regulations, including height bulk and scale regulations.
- Conformance with the Historic Guidelines, as amended and the incorporation of the Secretary of the Interior Standards for Rehabilitation for the rehabilitation of the Significant Historic Features, as discussed in Biological Resources, below.

Design Guidelines specific to the Franklin Station Hotel Structure:

- The hotel building should relate to the street and surrounding neighborhood with design elements that activate the street and provide a pleasant pedestrian experience.
- Select building materials, architectural details and finishes should convey a sense of permanence. Quality materials should be used to withstand the test of time regardless of architectural style. Approach character-defining details in a manner that is true to a style of architecture or common theme.
- Activate upper-story step back areas of the hotel building with balconies, roof gardens or similar features.
- Non-historic elevations of the hotel building shall provide high quality, durable materials and attention to detail. Buildings shall provide a human scale and facilitate pedestrian activity. Pedestrian oriented features, such as outdoor seating, are encouraged to enliven the public realm.
- Entries should be substantial and well-detailed. Doors should match the high-quality materials and character of the window design.
- The hotel building shall be enhanced with architectural elements such as porches, stoops, bay windows, balconies, eaves, brise-soleil, or massing articulation at the non-historic building corners. Façade materials shall turn the corner to employ the same vocabulary of materials.
- Corner buildings shall have consistent material treatments on front and exposed side facades.
- Frame south-facing and southwest-facing windows with protruding vertical or horizontal shading devices such as lintels, sills and awnings to provide adequate protection from glare. Windows and doors with real mullions are required to create shade and shadow (i.e., no inserts or mullions set inside the glass).

- Break up the mass of the hotel building with articulation in form, architectural details, and changes in materials and colors.
- Incorporate architectural elements and details, such as adding notches, grouping windows, adding loggias and dormers, varying cornices and rooflines.
- Vary materials and colors to enhance key components of a building's façade, such as with window trim, entries and projecting elements.
- Use articulation in form including changes in wall planes, upper-story building step backs and/or projecting or recessed elements.
- The Third Street elevation should emphasize and feature a welcoming main entrance and be designed according to simple and harmonious proportions in relationship to the overall size and scale of the building. Ensure that the pedestrian entry provides shelter year-round.
- The hotel building shall provide entrances and entry approaches from Second and Third streets that can accommodate persons of all mobility levels.
- Service and maintenance areas should be accessed from interior drives or corridors, but where necessary fronting on a public street they shall be set back and screened from public view to provide a quality pedestrian experience.
- Balconies and decks should be well detailed with high quality, durable materials and attention to the method of joinery.
- Special attention should be paid to the first three floors of the hotel building to maximize opportunities to engage the pedestrian and enable an active and vibrant street front.
- Hotel balconies up to six feet in depth are encouraged and can be either recessed or protruding. Where Juliet balconies are proposed, the windows behind the balcony shall be full length to convey appearance of doors.
- The hotel building should be designed without large uninterrupted expanses of wall surface. Where 15 feet or more of windowless wall is found to be unavoidable, eye-level displays, a contrast in wall treatment, outdoor seating, and/or planting shall be used to enhance visual interest and pedestrian area vitality.
- Awnings are recommended along street frontages, particularly where there are doorways.
- The hotel building shall utilize architectural elements such as cornices, lintels, sills, balconies and awnings to enhance building façades.
- The shape, size, color, and material of projections for shade protection should be consistent with the architectural style/character of the building. The minimum dimensions of awnings should be consistent with the width of the glazing.

Specific Parking Structure Guidelines include:

- The parking structure facades should complement nearby buildings by incorporating architectural elements (e.g., window and door design, varied building materials, decorative treatments, etc.) to provide visual interest and a strong urban form.
- Retail space in the parking structure shall incorporate recessed entries. The depth of recessed entries shall be proportional to the size of the entrance.
- Retail space in the parking structure shall incorporate recessed entries. The depth of recessed entries shall be proportional to the size of the entrance.
- The parking structure should vary and articulate the building façade to add scale and avoid large monotonous walls.
- The exterior walls of the parking structure provide an opportunity for public art, murals, or other creative way to enhance the City's sense of place.
- Create safe walkways and visual connections to the parking structure. Provide ample lighting in and around the parking structure to enhance safety.
- Access points to the parking structure should be as unobtrusive as possible and should not detract from the pedestrian orientation of Downtown.

With incorporation of these features, the Project would not conflict with the City goals and policies related to visual quality, or other applicable aesthetic or visual policies or standards.

b) The Project would not significantly alter the existing natural viewsheds, including changes in natural terrain or vegetation.

The Franklin Station Project site is already developed with structures. There is no natural terrain or native vegetation, or protected on the Project site. The City's General Plan guides development and use of land in the city. Although the General Plan was amended to adopt the Specific Plan, The DNSP EIR found that the Specific Plan is generally consistent with the existing goals and policies of the General Plan, which would remain relevant throughout the implementation of the Specific Plan. The DNSP EIR found that these impacts would be less than significant. The Project adheres to the requirements of the Downtown Specific Plan Design Guidelines as well as proposed additional guidelines (discussed previously) that would be implemented through the City's Design Review process. Overall, the Design Guidelines require the new development to respond to the surrounding context, as described above. The DNSP EIR found that while it is possible that some mature street trees may be removed as a result of individual development projects in the future, the Specific Plan encourages the addition of trees and landscaping along sidewalks, in plazas and other public spaces. The Project would remove the mature unhealthy trees on site and comply with City requirements for the addition of trees and landscaping along sidewalks. Removal of the trees on site would alter the visual appearance of the site, but in the Project's urban setting would not significantly alter existing natural viewsheds or change natural terrain or vegetation.

As described above, the Project conforms to the Design Guidelines. Although short- and medium-range views would be altered by the eventual build out of the Planning Area, resulting in various

view corridors appearing more densely built out, no scenic views or vistas would be substantially or adversely affected. Therefore, the Franklin Station Project would not significantly alter existing natural viewsheds or change natural terrain or vegetation.

c) The Project would not significantly change the existing visual quality of the region or eliminate significant visual resources.

The DNSP EIR evaluated whether the Specific Plan could potentially alter views along certain corridors. The DNSP EIR found that the Specific Plan would respond to the General Plan goal of improving the vitality and character of downtown through planning and design by implementing massing and design controls to moderate the degree of visual change between existing and new buildings and provide for articulation to enhance the visual interest of buildings. The Specific Plan largely maintains the existing street pattern while providing stronger street edges and enhanced pedestrian facilities and plazas. The proposed heights are designed to channel more intense development to the Downtown's core, creating a focal point with a strong civic presence within this area. The increased heights help to meet the objectives of the Specific Plan for increased use of underutilized properties and would be an appropriate way to generate additional vibrancy and encourage infill development. Lower heights transition to lower intensity in the surrounding areas, consistent with the existing character of these areas. In all areas, the DNSP Design Guidelines require varied massing for visual interest, setbacks to ensure consistency with existing historic structures and installation of street trees and pedestrian amenities to enliven the public realm and create a continual visual theme along streets Downtown. The DNSP EIR found that these changes would not result in an adverse impact, but potentially result in a beneficial impact.

The City of Napa does not have any officially designated scenic views or vistas. However, at build out the implementation of the Specific Plan would result in the replacement of existing structures and underutilized lots with potentially larger and taller buildings. In response to this, height limits were permitted up to 75 feet within the Downtown I zone, 60 feet within the Downtown II zone and transitioned to a lower height of 35 feet in the outer Transition zone. Franklin Station generally conforms to the Downtown II height limit, with the additional rooftop exclusion described above. The Building Form Standards regulate building heights within the Planning Area so as to concentrate the taller heights in the central Downtown areas, where the Project would be located.

The Project could redefine Downtown's profile against the sky within the Planning Area's core. While generally conforming to the 60-foot height limit, this impact could be noticeable but would not be substantial or adverse. Taller development is allowed in the Downtown I zone. Existing development reach 75 feet (Archer Hotel) in Downtown I, and 59 feet in height (originally, Avia now Andaz Hotel) in Downtown II. As such, the Project's development up to 60 feet with certain roof top features that exceed that height would not be a substantial or adverse visual impact over existing and permitted conditions.

Although the implementation of the Specific Plan would result in a change to the visual character of Downtown, the DNSP EIR found that the proposed increases in height would meet the objectives of the General Plan and would serve to better guide future development in the City's historic downtown. As such, while the Project as proposed would result in a change from the existing visual

character, such change is within the changes contemplated in the DNSP and under the EIR would not result in adverse visual impacts, and impacts to visual character would be less than significant.

d) The Project would not significantly increase light and glare in the project vicinity.

The DNSP EIR evaluated whether implementation of the Specific Plan would significantly increase light and glare. The Specific Plan recommended the following guidelines to address potential light and glare impacts: specify exterior lighting where the cone of light and/or glare from the lighting element is kept entirely on the property or below the top of any fence, edge or wall; verify that fixtures do not cast light directly into adjacent residential windows; a translucent or optical lens diffuser globe or shield is recommended; balance the need to provide illumination and security with the desire to maintain the ambience of Downtown and minimize light pollution.

The Project is required to incorporate these guidelines into the Project design. Because the Franklin Station Project would incorporate the above Specific Plan guidelines, the Project would not significantly increase light and glare in the Project vicinity.

e) The Project would not significantly reduce sunlight or introduce shadows in areas used extensively by the public.

The DNSP Design Guidelines require development to be sensitive to the existing lots and require that new development. With the incorporation of the Design Guidelines for the Franklin Station Hotel, the standards guidelines contained in the Downtown Napa Specific Plan, including the Historic Design Guidelines (as proposed to be amended), and parking structure guidelines, the Project would not overwhelm the existing pedestrian experience on the street, which is the public space near the Project site. Therefore, the Project would not significantly reduce sunlight or introduce shadows in areas used extensively by the public.

Mitigating Policies and Implementing Programs

The DNSP EIR did not include mitigation measures relating to aesthetics. The DNSP EIR found the Specific Plan consistent with the General Plan, including guidelines and policies relating to aesthetics.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant aesthetic impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant aesthetic impact.
4. There is no new information of substantial importance showing that significant aesthetic impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issues	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
3. Air Quality and Greenhouse Gases *Would the project:*				
a. Conflict with or obstruct implementation of the applicable air quality plan.	☐	☐	☐	☒
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	☐	☐	☐	☒
c. Result in a cumulatively considerable net increase of any nonattainment 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).	☐	☐	☐	☒
d. Expose sensitive receptors to substantial pollutant concentrations.	☐	☐	☐	☒
e. Create objectionable odors affecting a substantial number of people.	☐	☐	☒	☐
f. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	☐	☐	☐	☒
g. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to air quality and greenhouse gases resources and as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new or substantially more severe significant environmental effects relating to air quality and greenhouse gases.

a) The Project would not conflict with or obstruct implementation of the applicable air quality plan beyond the level analyzed on the EIR.

The EIR found that development facilitated by the DNSP could potentially result in increased long-term emissions of criteria pollutants from increased vehicle traffic and onsite area sources. The DNSP EIR relied on the Bay Area Air Quality Management District (BAAQMD) revised *CEQA Air Quality Guidelines*, which recommend the assessment of operational air quality impacts associated with local plans, including specific plans, to evaluate whether the plan in question is consistent with the most recently adopted air quality plan for the Bay Area. The Guidelines include the following two metrics for determining significance of criteria pollutant emissions impacts from local plans: (1)

consistency with the so-called "control measures" contained in the current regional air quality plan; and (2) the projected rate of increase in vehicle miles traveled or vehicle trips would be less than or equal to projected population increase. These two metrics also were utilized in the analysis of whether growth facilitated by the DNSP could potentially be fundamentally inconsistent with the growth assumptions in the BAAQMD *2010 Clean Air Plan* (CAP). To be consistent, the DNSP must not exceed the population or vehicle miles traveled (VMT) assumptions contained in the CAP and must implement transportation control measures (TCMs) as applicable. Even with mitigation, the EIR found the impact to be significant and unavoidable. While it would be consistent with the BAAQMD TCMs, implementation of the Specific Plan was determined to be inconsistent with the population and VMT assumptions of the CAP.

The EIR identified potentially applicable control measures from the CAP and correlated those to specific elements of the DNSP or presented justification for why the control measure does not apply to the DNSP to reach the conclusion that the DNSP would not disrupt or hinder implementation of any CAP control measures. For consistency with two applicable TAC control measures, the EIR provided Mitigation Measure (MM) 4.B-1.

In Resolution R2012 54 the City Council of the City of Napa issued, pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations, identifying specific economic social and other considerations that render the unavoidable significant adverse environmental effects acceptable. The Statement of Overriding Considerations considered the air quality related impacts of the DNSP, which were discussed in Section 4-B of the EIR. The EIR identified the mitigation measures to reduce the air quality impact from the DNSP. Despite implementation of the identified mitigation, significant unavoidable impacts remain. The City determined that this impact would be outweighed by the DNSP benefits as set forth in the statement of overriding considerations. Having considered the unavoidable adverse impacts of the Specific Plan Project, the City determined that all feasible mitigation have been adopted to reduce or avoid the potentially significant impacts identified in the EIR and that no additional feasible mitigation was available to further reduce significant impacts. The City found that economic, social, and other considerations of the Specific Plan Project outweighed the unavoidable adverse air quality impacts. The City made a finding that it had balanced the benefits of the Specific Plan Project against its unavoidable environmental impacts and indicated its willingness to accept those impacts

While it would be consistent with the BAAQMD TCMs, implementation of the Specific Plan would be inconsistent with the population and VMT assumptions of the CAP. The Franklin Station Project would comply with MM 4.B-1 by working with the City to install charging units, if feasible, in the city garage or other suitable locations and providing preferred rates on its valet for electric and/or hybrid vehicles. While this impact remains significant and unavoidable as identified in the DNSP EIR, the Franklin Station Project would not increase the impact beyond the level of significance identified in the EIR.

b) The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation beyond the level analyzed on the EIR.

For consistency with the CAP in relation to VMT, BAAQMD requires that the projected increase in VMT associated with a proposed project be less than the projected population increase. The EIR found that projected population increase to the 2035 countywide and citywide forecasts is a total increase in population of 0.9 percent and 1.6 percent, respectively. The DNSP would increase daily VMT by approximately 63,397 miles per day by the year 2035, or an annual increase of approximately 2756 miles per day. The addition of DNSP-related VMT to the 2035 countywide and citywide forecasts results in a total increase of 2.0 percent and 4.9 percent in the VMT for the DNSP, respectively. Consequently, the rate of increase in VMT would be more than the rate of increase in population under the DNSP on both a countywide and citywide basis and would be considered inconsistent with the population and VMT assumptions of the CAP. The EIR noted that the standards set by the CAP can be difficult for plans and communities to achieve and are intended as goals to improve air quality rather than to prohibit development. Even with mitigation, the EIR found the impact to be significant and unavoidable. While it would be consistent with the BAAQMD TCMs, implementation of the Specific Plan would be inconsistent with the population and VMT assumptions of the CAP.

The EIR identified potentially applicable control measures from the CAP and correlated those to specific elements of the DNSP or presented justification for why the control measure does not apply to the DNSP to reach the conclusion that the DNSP would not disrupt or hinder implementation of any CAP control measures. The EIR found the impact to be significant and unavoidable. For consistency with two applicable TAC control measures, the EIR provided MM 4.B-1.

In Resolution R2012 54 the City Council of the City of Napa issued, pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations, identifying specific economic social and other considerations that render the unavoidable significant adverse environmental effects acceptable. The Statement of Overriding Considerations considered the air quality related impacts of the DNSP, which were discussed in Section 4-B of the EIR. The EIR identified the mitigation measures to reduce the air quality impact from the DNSP. Despite implementation of the identified mitigation, significant unavoidable impacts remain. The City determined that this impact would be outweighed by the DNSP benefits as set forth in the statement of overriding considerations. Having considered the unavoidable adverse impacts of the Specific Plan Project, the City determined that all feasible mitigation have been adopted to reduce or avoid the potentially significant impacts identified in the EIR and that no additional feasible mitigation was available to further reduce significant impacts. The City found that economic, social, and other considerations of the Specific Plan Project outweighed the unavoidable adverse air quality impacts. The City made a finding that it had balanced the benefits of the Specific Plan Project against its unavoidable environmental impacts and indicated its willingness to accept those impacts

Traffic demand strategies and control measures have been analyzed in the Traffic Report. While it would be consistent with the BAAQMD TCMs, implementation of the Specific Plan would be inconsistent with the population and VMT assumptions of the CAP. The Franklin Station Project would comply with MM 4.B-1 by working with the City to install charging units, if feasible, in the city

garage or other suitable locations and providing preferred rates on its valet for electric and/or hybrid vehicles. While this impact remains significant and unavoidable as identified in the DNSP EIR, the Franklin Station Project would not increase the impact beyond the level of significance identified in the EIR.

c) The Project would not result in a cumulatively considerable net increase of any nonattainment 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) beyond the level analyzed on the EIR.

On a cumulative basis, the 2010 BAAQMD Guidelines recommend that Plan-level impacts be assessed based on consistency with growth assumptions of the current CAP for the purposes of assessing regional impacts and do not identify the need for a quantitative analysis of operational or construction-related criteria pollutant emissions from a Plan in addition to reasonably foreseeable future projects. No single project is sufficient in size to, by itself; result in nonattainment of ambient air quality standards. The DNSP would result in a rate of increase of VMT that would be more than the rate of increase in population for the DNSP and would thus be considered inconsistent with the population and VMT assumptions of the CAP. Thus, this impact would be considered significant and cumulatively considerable. With implementation of MM 4.B-1, the DNSP would be consistent with the BAAQMD TCMs. However, the DNSP would remain inconsistent with the population and VMT assumptions of the CAP. As such, the DNSP would be considered significant and would result in a cumulatively considerable criteria air pollutant impact.

In Resolution R2012 54 the City Council of the City of Napa issued, pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations, identifying specific economic social and other considerations that render the unavoidable significant adverse environmental effects acceptable. The Statement of Overriding Considerations considered the air quality related impacts of the DNSP, which were discussed in Section 4-B of the EIR. The EIR identified the mitigation measures to reduce the air quality impact from the DNSP. Despite implementation of the identified mitigation, significant unavoidable impacts remain. The City determined that this impact would be outweighed by the DNSP benefits as set forth in the statement of overriding considerations. Having considered the unavoidable adverse impacts of the Specific Plan Project, the City determined that all feasible mitigation have been adopted to reduce or avoid the potentially significant impacts identified in the EIR and that no additional feasible mitigation was available to further reduce significant impacts. The City found that economic, social, and other considerations of the Specific Plan Project outweighed the unavoidable adverse air quality impacts. The City made a finding that it had balanced the benefits of the Specific Plan Project against its unavoidable environmental impacts and indicated its willingness to accept those impacts

The Franklin Station Project would implement MM 4.B-1. Even with implementation of MM 4.B-1, the EIR concluded that the rate of increase in VMT would be more than the rate of increase in population for the DNSP, which renders the DNSP inconsistent with the population and VMT assumptions of the CAP. This inconsistency was identified as a significant and unavoidable impact in the EIR. Because the DNSP's transportation strategies and the EIR's mitigation represent the majority of available measures with which to reduce VMT, no further feasible mitigation measures

are available. On a cumulative basis, the EIR concluded that growth from development facilitated by the DNSP could potentially be fundamentally inconsistent with the growth assumptions of the *Bay Area 2010 Clean Air Plan*. While the impact remains potentially significant and unavoidable as identified in the DNSP EIR, the Franklin Station Project would not increase the impact beyond the level of significance identified in the EIR.

d) The Project would not expose sensitive receptors to substantial pollutant concentrations.

The EIR concluded that development facilitated by the DNSP could potentially expose existing and proposed sensitive receptors to substantial levels of toxic air contaminants (TACs), which may lead to adverse health effects. TAC emissions from construction activities under the DNSP would be related to diesel particulate matter (DPM) emissions from heavy equipment operations during grading, excavation, building construction, and transportation activities. Short-term construction activities from the Franklin Station Project could expose sensitive receptors to levels that exceed applicable standards because of the close proximity between onsite diesel construction equipment and residences. Because the Project may include stationary sources that may emit TACs it would be subject to BAAQMD permitting and Toxics Best Available Control Technology (T-BACT) requirements that impacts associated with exposure of sensitive receptors to substantial toxic air emissions from stationary source operations would be less than significant. Onsite mobile sources of TAC emissions would primarily be associated with the operation of diesel-fueled delivery trucks associated with the Project's commercial land uses as analyzed in the EIR. Given that proposed developments near the Project have not yet been identified but given the potential proximity of nearby or on-site sensitive receptors to mobile-source TACs associated with commercial activities, the impact was considered a potentially significant impact. Because proposed residences would be considered sensitive receptors, the EIR required that the City ensure that the DNSP design guidelines and development standards incorporate MM 4.B-2 to reduce or avoid exposure of sensitive receptors to TACs. The Franklin Station Project would comply with the design guidelines and would implement MM 4.B-2. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations.

e) The Project would not create objectionable odors affecting a substantial number of people.

The EIR concluded that development facilitated by the DNSP could potentially create objectionable odors affecting a substantial number of people. Though offensive odors from stationary sources rarely cause any physical harm, the EIR found that it can lead to public distress generating citizen complaints to local governments. The Project may include uses that are sources of odorous emissions (e.g., food service) that could be perceived as offensive to some individuals. The EIR requires the City to ensure that projects incorporate the measures to reduce or avoid exposure of sensitive receptors to odors. With mitigation, the EIR determined that impacts from objectionable odors affecting a substantial number of people are less than significant.

The Franklin Station Project includes commercial food service and could include other uses that result in objectionable odors, but does not propose any other potential sources of odorous emissions. Implementation of MM 4.B-3 with ventilation and mechanisms in the building permit would control and limit releases of objectionable odors from such uses. Therefore, Franklin Station would not create objectionable odors affecting a substantial number of people.

f) The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

The EIR analyzed whether development facilitated by the DNSP could potentially generate greenhouse gas (GHG) emissions that may have a significant effect on the environment. The EIR also analyzed whether the DNSP potentially could conflict with applicable plans, policies, regulations adopted by agencies with jurisdiction over the DNSP for reducing GHG emissions. The EIR discussed and quantified estimated GHG emissions of the DNSP at full build out and the approaches to reduce those emissions. The BAAQMD does not have a GHG threshold associated with construction activities for specific plans. Because BAAQMD (and the California Air Pollution Control Officers Association) considers GHG impacts to be exclusively cumulative impacts, assessment of significance is based on a determination of whether the GHG emissions from the DNSP represents a cumulatively considerable contribution to the global atmosphere.

Conservative default assumptions of the BAAQMD GHG Model (BGM) were used to determine GHG emissions associated with operation of the land uses to be developed under the DNSP, including increased residential, retail, restaurant, office, and hotel land uses. Operational DNSP-related greenhouse gas emissions would be approximately 23,089 metric tons/year of CO2e (including emissions from vehicle trips, space heating, landscape equipment, and indirect emissions from the use of electricity, solid waste generation, and water and wastewater treatment and conveyance). These calculations assumed standard building techniques and do not reflect the DNSP sustainable building guidelines. However, the City's DNSP sustainability measures, High Performance Building Ordinance, and the Citywide Sustainability Plan currently underway would result in reduced GHG emissions. Thus, the values presented in the EIR were found to be are higher than actual. Notably, the criteria set by the BAAQMD can be difficult for plans and communities to achieve, and are intended to meet AB 32 GHG reduction goals rather than to prohibit development.

The EIR requires the City to ensure that applicant(s) for individual projects comply with MM 4.B-5. This would require the Project to incorporate Green Building and Development Measures. New development under the DNSP must reduce GHG emissions from operation by 30 percent from business-as-usual 2020 emissions levels, in order to achieve 1990 levels by 2020. Even with mitigation, emissions from development facilitated by the DNSP would remain cumulatively significant because of the volume of development contemplated by the DNSP.

The Franklin Station Project would implement MM 4.B-5 through compliance with the City's High Performance Building Regulations and CalGreen standards, which have been updated since the adoption of the DNSP. Franklin Station's compliance with these regulations is a condition of approval, which would reduce GHG emissions by at least 30 percent from business as usual when combined with State and Local measures and ensure consistency with the DNSP. Therefore, the Project would not generate significant greenhouse gas emissions in relation to what was examined in the EIR.

g) The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases beyond the level analyzed in the EIR.

See analyses under Air Quality and Greenhouse Gases, a and b, above.

The EIR concluded that the DNSP could potentially conflict with applicable plans, policies or regulations of an agency with jurisdiction over the DNSP adopted for the purpose of reducing the emissions of GHGs. The EIR found that the DNSP does not pose any explicit conflict with the applicable list of California Air Resources Board GHG reduction strategies. Some of the strategies are partially applicable to development projects, such as increasing energy efficiency in new construction, installation of solar panels on individual building roofs, and a "green building" strategy. Because development facilitated by the DNSP would emit GHGs that exceed the service population-based efficiency thresholds of the BAAQMD which were derived based on AB 32 attainment goals, implementation of the DNSP would also conflict with AB32 and its associated planning efforts. Implementation of MM 4.B-5 would reduce GHG emissions associated with the DNSP. However, even with mitigation, since emissions related to the DNSP would be considered cumulatively significant, the DNSP would conflict with the goals of the Draft Napa Countywide Community Climate Action Plan and AB 32.

The Franklin Station Project is subject to and would comply with the DNSP Design Guidelines and sustainability requirements and the EIR's mitigation measures MM 4.B-1 through 4.B-5. Specifically in its building permit applications, Franklin Station must incorporate Green Building and Development Measures into the Project design to demonstrate GHG emissions from operations would adhere to the City's reduction goals. By incorporating these measures, Franklin Station would be consistent with the DNSP and would not otherwise conflict with applicable plans, policies or regulations adopted to reduce emission of greenhouse gases.

Mitigating Policies and Implementing Programs

The Franklin Station Project shall comply with the following mitigation measures and implementation procedures for the DNSP EIR:

- MM 4.B-1
- MM 4.B-2
- MM 4.B-3
- MM 4.B-4
- MM 4.B-5

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant air quality and greenhouse gases impacts that were not evaluated in the DNSP EIR.

3. The proposed Project would not result in an increase in the severity of a previously identified significant air quality and greenhouse gases impact.
4. There is no new information of substantial importance showing that significant air quality and greenhouse gases impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
2. Agriculture Resources *Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use.	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	☐	☐	☐	☒

a) The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

The DNSP EIR found that the Specific Plan would have no impact on agricultural resources. The Planning Area, as with the majority of developed land in the City of Napa, is designated by the California Department of Conservation's Important Farmland in California Map as urban and built-up land (Department of Conservation, 2006). Therefore, the DNSP EIR found that Specific Plan would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to nonagricultural use. Because the Project is located on previously developed urban lands within the Planning Area, it would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to nonagricultural use.

b) The Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

The Planning Area, as with the majority of developed land in the City of Napa, is designated as urban and built-up land (Department of Conservation, 2006). Therefore, the DNSP EIR found that Specific

Plan would not conflict with existing zoning for agricultural use, or a Williamson Act contract; and would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use. The DNSP EIR found that the Specific Plan would have no impact on agricultural resources. Because the Project is located on previously developed urban lands within the Planning Area that is not zoned for agriculture or under Williamson Act contract, it would not conflict with existing zoning for agricultural use, or a Williamson Act contract; and would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.

c) The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

The DNSP EIR found that the Specific Plan would not cause rezoning of forest land, timberland or timberland zoned Timberland Production because the majority of than in the Planning Area is developed land in the City of Napa, is designated as urban and built-up land. Because the Project is located on developed urban and built-up land in the Planning Area, it would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

d) The Project would not result in the loss of forest land or conversion of forest land to non-forest use.

The DNSP EIR found that the Specific Plan would not result in the loss of forest land or convert forest land to non-forest use because the majority of than in the Planning Area is developed land in the City of Napa, is designated as urban and built-up land. Because the Project is located on developed urban and built-up land in the Planning Area and does not contain any forest land, it would not result in the loss of forest land or convert forest land to non-forest use.

e) The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The DNSP EIR found that the Specific Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use because the majority of than in the Planning Area is developed land in the City of Napa, is designated as urban and built-up land. Because Franklin Station is located on developed urban and built-up land in the Planning Area, it would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

General Plan and DNSP Mitigating Policies and Implementing Programs

There are no applicable mitigation measures or policies because neither the DNSP nor Franklin Station would have impacts on agricultural or timber resources.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant land use and planning impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant land use and planning impact.
4. There is no new information of substantial importance showing that significant land use and planning impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
4. Biological Resources *Would the project:*				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFG or USFWS.	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFG or USFWS.	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	☐	☐	☐	☒
e. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.	☐	☐	☐	☒
f. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to biological resources and, as detailed below, it was determined that the Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to biological resources.

a) The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFG or USFWS.

Based on existing site conditions and the established significance criteria, the DNSP EIR found that the Specific Plan had the potential to adversely impact special-status species and implementation of General Plan policies could generally contribute to lessening biological resources impacts within the Planning Area.

The presence of these species has not been identified on the Franklin Station site (which is fully developed). Therefore, Franklin Station would not have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFG or USFWS.

b) The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFG or USFWS.

The Franklin Station Project is not adjacent to a riparian habitat or other sensitive natural community. The Project site already is developed with structures in an urban setting and is not adjacent to riparian areas. Therefore, the Project would not have a substantial adverse effect on riparian habitat or other sensitive community.

c) The Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

No wetland sites exist on the Project site or would be impacted by its development. Therefore, the Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The Project site is fully developed in an urban setting, so movement of wildlife through the Project site does not occur. There are no habitat areas, (including wetlands, streams, and riparian habitats), wildlife movement corridors or nurseries adjacent to the Project site. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e) The Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

The Project site is a fully developed urban site with no habitat, nesting, plant or animal communities or wildlife corridors. No such resources are directly adjacent to the site. Therefore, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

f) The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

As explained above, because the Project site does not contain biological resources on site or impact adjacent resources, or contain protected native trees on the Project site, it would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

g) The Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved plan.

The Project site is not located within any habitat conservation or natural community conservation plan or other plan. Therefore, no conflict with any habitat conservation or natural community conservation plan would result.

Mitigating Policies and Implementing Programs

No mitigation is required.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant biological resources impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant biological resources impact.
4. There is no new information of substantial importance showing that significant biological resources impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
5. Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to cultural resources and, as explained below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to cultural resources, and no further environmental review is required.

The analysis completed for this Addendum identified new information related to the period of historical significance and original configuration of the Historic Post Office building. However, none of the new information meets any of the thresholds identified in CEQA Guidelines Section 15162(a)(3)(A)-(D) that would warrant the preparation of a subsequent or supplemental EIR, and therefore, the Project would not result in any new or more severe impacts with respect to historical resources that were not previously analyzed and disclosed in the DNSP EIR. Therefore, no further environmental review is required.

a) The Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

The EIR found that development facilitated by the DNSP could potentially have a significant impact on historic architectural resources. The EIR noted that historic commercial properties are generally centrally located in Downtown Napa, especially along Main Street, Brown Street, and Coombs Street and First, Second, and Third streets. This includes the specific area of the Franklin Station Project. The EIR refers to The Downtown Napa Historic Context Statement and Survey Report and the Downtown Napa Historic Resources Design Guidelines ("Guidelines"), which were prepared in conjunction with the Specific Plan (Page and Turnbull, 2010 and 2011). These documents provide a detailed list of all historic buildings in the Downtown and provide guidelines for the height of additions and adjacent new construction. The EIR concluded that implementation of the Specific Plan could potentially facilitate the alteration or demolition of recorded historic resources in

Downtown Napa (i.e., cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5). For example, new development allowable under the Specific Plan could indirectly apply development pressures at or adjacent to historic resources which could alter their integrity through demolition or incompatible adjacent new construction.

The EIR also concluded that implementation of the City of Napa Downtown Historic Design Guidelines, which call for the application of the Secretary of the Interior's Standards for both alterations to existing historic buildings and new development adjacent to historic buildings, would reduce the impact of the plan to a less-than-significant level. The Design Guidelines are not a regulatory document. Instead they provide general guidance to City staff, property owners, and project applicants. However, there is no mandate that these groups adhere to these Design Guidelines when implementing the Specific Plan. Therefore, impacts to historic resources were considered potentially significant. The City of Napa in certification of the DNSP EIR adopted MM 4.D-1, which states:

> The City shall require that any future development under the Specific Plan meets the intent and goals of the City of Napa Downtown Historic Design Guidelines. This includes any project that would alter historic resources or would be constructed adjacent to a historic resource. Alternatively, the General Plan shall include a new policy which requires that any development in the Downtown Area adhere to the goals identified in the City of Napa Downtown Historic Design Guidelines.

The Downtown Napa Historic Resources Design Guidelines also direct the project proponent to follow, where feasible, the Secretary of the Interior's *Standards for Rehabilitation.* The EIR found that implementation of MM 4.D-1 would reduce impacts to historic architectural resources to a less-than-significant level. The purpose of this mitigation measure is to reduce impacts from development projects in the DNSP area on historic architectural resources to a less-than-significant level, consistent with the requirements of CEQA.

The Franklin Station Project proposes new "PD Historic Standards" that are intended to meet the intent and goals of the City of Napa Downtown Historic Design Guidelines, but apply specific requirements related to protection of the building's Significant Historic (i.e., character defining) Features and to the additions and alterations for the adaptive reuse. The proposed PD Historic Standards would replace the recommendations in the Guidelines, which did not contemplate the rehabilitation that is now required to preserve the building after the 2014 earthquake. These proposed PD Historic Standards along with the Project actions would allow new additions and related construction on the overall site of the historic building subject to Design Review and a Certificate of Appropriateness.

The entire Post Office structure is in deteriorated condition due to the 2014 South Napa Earthquake. The Franklin Street Station Post Office experienced significant damage as a result of the South Napa Earthquake. The United States Postal Service estimated that the damage to the building would cost $8 million in repairs to make the building functional again for Post Office purposes.

Directly relative to the historic structure, the Project would allow removal of the damaged shell of the building, retain and rehabilitate its historic front (north) and partial east and west side facades. The proposal also includes what constitutes an addition above and behind, along with related new construction at the west side of the historic structure that wraps around the rear of the overall site to the east side of the block. The Project would allow, with a future Certificate of Appropriateness and subject to detailed compliance with the Secretary of the Interior's Standards for Rehabilitation, the removal of approximately 4/5^{ths} of the structure from the site, leaving the identified historic features of the building front to a depth equal to and inclusive of the depth of the existing interior lobby. The adaptive reuse and rehabilitation would include an addition to the retained portion of the building located behind the structure. The addition would be allowed to be taller than and wider than the resource, up to the City Height limits and property setbacks. The required removal of a significant portion of the structure was not contemplated in the pre-earthquake guidelines.

Preservation Architecture completed an analysis of the proposed Project titled Napa Franklin Station 1351 Second Street Historic Resource Summary and Project Evaluation and dated August 17, 2018 (the "Historic Resource Evaluation"). The damage from the 2014 Earthquake constitutes a change in the circumstances underlying the implementation of the DNSP project, and the Historic Resource Evaluation constitutes new information regarding potential development under the DNSP that was not known at the time of the adoption of the DNSP EIR. However, as explained below, based on this review and the analysis in the Historic Resource Evaluation related to the Franklin Station Project, the City has determined that its CEQA evaluation of the proposed Project does not require revisions to the EIR's analysis of impacts to cultural resources, and the Franklin Station Project would not result in impacts to cultural resources that have not already been addressed in the EIR.

CEQA Guideline Section 15162(a)(3) provides the required analysis to determine whether additional environmental review is required when there is new information. It states that additional environmental analysis in an EIR is required if:

> New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
> (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
> (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
> (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
> (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The new information, as described in the Historic Resource Evaluation resulting from the Earthquake and as explained below, is information that could not have been known with the exercise of reasonable diligence at the time of the DNSP EIR certification because it resulted from Earthquake damage that occurred after the DNSP was adopted and the EIR was certified. Although the information described in the April 2018 Historic Resource Evaluation could not have been known at the time of the certification of the DNSP EIR, preparation of a subsequent EIR is not required because none of the criteria set forth under CEQA Guidelines Section 15162(a)(3)(A)-(D) are met. The following analysis is provided in reference to CEQA Guideline Section 15162 (a)(3)(A)-(D), even though such additional analysis is not required. This analysis focuses on impacts of the Franklin Station Project that could be more significant or severe than analyzed in the EIR and related feasibility of the mitigation measures.

The new information provided in the Historic Resource Evaluation clarifies the current status of Historic Building/cultural resource. This information informs the appropriate application of the Guidelines for the Historic Building. The Historic Resource Evaluation provides detailed evaluations of the application of the Guidelines and the Secretary of the Interiors Standards for Rehabilitation.

The Downtown Napa Historic Resources Design Guidelines direct the Project proponent to follow, where feasible, the Secretary of the Interior's Standards for Rehabilitation. In addition to the general guidelines, a set of specific guidelines including photographs and illustrations showing how to treat the height, massing and specific elements of each building was prepared. The Guidelines prepared for the U.S. Post Office, Franklin Station, in the DNSP (See Guidelines pages 116-117 were based on information available from 1998 through 2011, published in 2011 and 2012, and adopted in 2012, prior to the earthquake. Because the Guidelines were established prior to the 2014 Earthquake and damage to the building, the PD proposes replacing the Guidelines to allow the adaptive reuse of the damaged building. With respect to additions and related new construction, the current Guidelines additionally recommend that alterations should be minor and should meet the *Standards*; and that rooftop or horizontal additions are not recommended to preserve the building's iconic massing and horizontality.

The Guidelines should be interpreted and read in context with the best available information about the specific resource as described in the Historic Resource Report and Historic Resource Evaluation. To this point, the Guidelines state:

> The recommendations regarding potential additions to the building and adjacent new construction were driven by the historic status of the building and the location of the building in relation to neighboring historic resources. An appropriate design recommendation for one historic resource may not be appropriate for another; therefore, the guidelines created for each building—specifically those that pertained to potential additions and adjacent new construction—were generated based on the types of resources present on the city block on which the resource was located.

At the time the Guidelines were adopted, the following was known about the resource:

The Post Office was added to the National Register of Historic Places (NHRP) on January 11, 1985. Because the Franklin Street Station Post Office experienced significant damage as a result of the South Napa Earthquake, in May 2015 the United States Postal Service in consultation with the California State Historic Preservation Officer submitted to the National Register of Historic Places nomination amendment #85000133, which documents the post-earthquake "Significant Historic Features" of the exterior and interior of the Property.

The Napa Franklin Station Post Office was originally listed on the NHRP in 1985, in part for its strong identification with the use of the Art Deco movement in the WPA Post Offices of the 1930s. It was determined to be significant at the State and local levels under NRHP Criterion C (Design/Construction). Figure 1 is a historic photograph of the building, presumably shortly after its construction.

The nomination stated that the Napa Franklin Station was considered "unusually well preserved." It retained integrity of location, design, setting, materials, workmanship, feeling, and association. It was described as "an important example of the transition to the Starved Classicism characteristic of federal design in the mid-to-late thirties, and makes plain the debt Starved Classicism owed to Art Deco stylistic concepts." In addition to this broader significance, it was found to possess "considerable aesthetic value in its own right."

The 1985 nomination detailed the historic building's character defining features and which rendered it eligible for listing on the NHRP. Significant exterior features specified in the 1985 nomination include:

- Projected central area flanked by two recessed wings
- Simple geometry of the building's massing
- Seven piers topped by a terracotta "capital" in a stylized floral motif
- Cornice extending from the roofline formed of terracotta ram and cow heads
- Ornament that consists of decorative brickwork and terracotta panels in a geometric motif
- Bronze and milk glass urn-shaped light fixtures adjacent to the entryways
- Large terracotta panel containing an Art Deco eagle above each door

Significant interior features specified in the 1985 nomination include:

- Decorative post office lobby
- Original cast bronze drop lights and raised-plaster ceiling
- Decorative terrazzo floor in lobby
- Raised bas relief gilt and painted plaster on the ceiling
- Terracotta panel with geometricized floral pattern at each end of the central frieze

Following the earthquake, new and accurate information about the Post Office became available that was not present in the context of the Guidelines. That information is detailed in the Evaluation and includes:

- The significant damage to the building caused by the earthquake.

- The Postal Service planned to demolish the building because it would cost $8 million to repair quake damage, while it would cost only $500,000 for demolition.
- The Postal Service would not continue use of the property as a post office.
- The Postal Service would sell the property.
- The 2015 National Register of Historic Places nomination amendment that documents the post-earthquake "Significant Historic Features" of the exterior and interior of the Property that differ from the Guidelines.
- The 2017 Preservation Covenant that contemplates additions and alterations, and provides for protection of the building's identified Significant Historic Features.
- The State Historic Preservation Officer's consultation on and review of the items above.

The 2015 NRHP amendment determined that the 2014 earthquake damage affected the property's interior historic integrity with regard to the aspect of architectural materials. The materials of the interior at the east and west side lobbies have been severely compromised. Materials such as terracotta, marble, and brick were damaged, broken, and dislodged at the interior ends of the building. The central areas of the lobby's interior have less damage to the historic character defining features than the east and west sides of the building. The identified loss of interior material integrity is insufficient to result in the overall loss of historic integrity. Thus, this amendment determined that the 2014 earthquake damage did not significantly affect the property's exterior architectural integrity of design, workmanship, materials, and location. Consequently, the resource continues to meet NRHP Criterion C because the primary exterior characteristics and qualities, which caused it to be originally listed and with which its identified significance is conveyed are still present.

Based on the information in the amendment, the Napa County Landmarks, Inc.[4] and the United States Postal Service, with consultation with the California State Historic Preservation Officer, developed a Preservation Covenant. That document was completed and the Preservation Covenant recorded with the quitclaim deed on March 6, 2017. In addition to providing guidance, process and restrictions on the building's rehabilitation, the Preservation Covenant is intended to mitigate impacts to the identified Significant Historic Features of the Historic Building, as it exists after the earthquake and removal of the post office use.

Paragraph 4 of the Preservation Covenant contains the Significant Historic Features of the building as described in the National Register of Historic Places nomination amendment. They are:

The Significant Historic Features of the exterior of the Building:

- Projected central area flanked by two recessed wings
- Simple geometry of the building's massing

[4] Napa County Landmarks, Inc. is a California not for profit corporation, which is the Covenant Holder of the Preservation Covenant. It provides the expertise and resources to monitor and enforce the preservation conditions, under the Secretary of the Interior's Professional Qualifications Standards for oversight to provide consistent application of the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and the Secretary of the Interior's Standards and Guidelines, and has accepted the responsibility of this Preservation Covenant

- Seven piers topped by a terracotta "capital" in a stylized floral motif
- Cornice extending from the roofline formed of terracotta ram and cow heads
- Ornament that consists of decorative brickwork and terracotta panels in a geometric motif
- Bronze and milk glass urn-shaped light fixtures adjacent to the entryways
- Large terracotta panel containing an Art Deco eagle above each door
- Monolithic windows on the main façade

The Significant Historic Features of the interior of the Building:

- Original cast bronze drop lights and raised-plaster ceiling
- Decorative terrazzo floor
- Marble wainscoting
- Raised bas relief gilt and painted plaster walls and ceiling
- Terracotta panel with geometricized floral pattern at each end of the central frieze
- Carved Art Deco wood ornaments over the service counter
- Original hanging lobby lamps
- Original brass-framed bulletin boards

In addition, alterations and additions for the proposed reuse are contemplated in the Preservation Covenant, which is contained in Paragraph 2. It provides that the project would develop an adaptive reuse of the Property. In this case, the reuse is the proposed hotel. And, it provides that such reuse would include alterations and additions, including to the side, rear and rooftop.

As described below, notwithstanding the damage to the building by the earthquake, and the proposed new Guidelines that would allow significant alterations beyond those originally contemplated in the DNSP EIR, the potential adverse effects of the proposed Project are less severe than the potential effects from development contemplated by the EIR due to the incorporation of new Guidelines and state and federal requirements described above that preserve the character defining features. This is consistent with the analysis in the DNSP EIR, which requires implementation of MM 4.D-1 to reduce project specific impacts to a less-than-significant level. Specifically, the proposed PD Historic Standards meet the intent and goals of the Guidelines as required by MM 4.D-1 by:

- Allowing for adaptive reuse as a hotel with rooftop, side and rear additions, consistent with the site plan, scale and massing exhibits, is appropriate in order to rehabilitate the earthquake damaged historic resource.
- Retaining those Significant Historic Features of the exterior and interior of the building as defined in the Preservation Covenant consistent with the site plan, scale and massing exhibits.
- Incorporating the Secretary of the Interior Standards for Rehabilitation for the rehabilitation of the Significant Historic Features.

The Historic Resource Evaluation analyzed the Project in light of conformance with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties and, specifically, the Standards for Rehabilitation (Standards). Because the Project proposes to alter and add to the Historic building,

the appropriate treatment and evaluation Standard is that of Rehabilitation, which is defined as follows:

When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment.

The Evaluation concludes that the Project meets the Standards. Specifically:

- The Franklin Station Project meets Standard 1: The proposed new uses associated with the historic structure would be commercial and, specifically, a hotel use, which would include public use areas. It would retain and rehabilitate all of the identified, historically significant areas, spaces and features of the historic building; and add related new construction behind, alongside and above the historic building and with which to adaptively reuse the property while continuing and reinforcing its identified historic character. Based on the current sets of guidelines, the identified distinction and distinctive (i.e., character-defining) exterior and interior materials, features, spaces and spatial relationships of the historic building would be minimally changed.
- The Franklin Station Project meets Standard 2: The historic character defining feature of the Historic Building would be retained and preserved as described above, and relative to the identified extent of the historic building, which consists of the identified exterior and interior forms, features and materials of the building front to a depth equal to and inclusive of the depth of the existing interior lobby, the proposed project would, without exception, retain the historic building's identified character-defining forms, features, materials, and spatial relationships, so would retain and preserve the identified historic character and characteristics of the building and its property.
- The Franklin Station Project meets Standard 3: The property would be recognized as a physical record of its time, place, and use. Per the project guidelines, proposed new construction is intended to specifically avoid imitation that would result in a contrived appearance or would otherwise detract from or compete with the retained historic building, and conjectural features are to likewise be avoided. Based on this direction, the project would not create any false sense of historical development.
- The Franklin Station Project meets Standard 4: No subsequent changes to the Historic Building are historically significant.
- The Franklin Station Project meets Standard 5: As discussed above, the distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property would be preserved because the building exterior masonry, which directly exhibits workmanship, would be retained and repaired or selectively replaced in-kind wherever repair is not feasible.
- The Franklin Station Project meets Standard 6: Per the current guidelines and Preservation Covenant and consistent with the site plan, scale and massing exhibits, the project proposes to rehabilitate the historic building without replacement of historic features and materials—

except where missing or severely deteriorated elements preclude repair, then replacement would be based on existing matching examples.

- The Franklin Station Project meets Standard 7: Chemical or physical treatments, if appropriate, would be undertaken using the gentlest means possible. The general approach to this work would be to clean, repair and refinish historic elements and materials to restore their architectural and material integrity, and when repair is infeasible to replace severely damaged and missing elements in-kind or with a compatible substitute material (ex: cast ornamentation) based on equivalent existing elements.
- The Franklin Station Project meets Standard 8: DNSP EIR MM 4.D-1, 4.D-2, 4.D-3, and 4.D-4 require mitigation of impacts to and protection of any Archeological resources.
- The Franklin Station Project meets Standard 9: The placement and design of the addition proposed by the Project, specifically where it would stand alongside and above the historic building, would be effectively set back from the retained historic building, with the placement of the addition located behind the plane of the front façade and the retained building volume directly behind the facade. As the guidelines also indicate, additions and new construction must give deference to the historic structure rather than compete with it for attention and interest so that the historic building stands out independent and in the foreground of the addition, with the addition clearly in the background. Per the guidelines, the future design would be independent of and differentiated with design characteristics that would complement the historic building to protect the present historic architectural integrity.
- The Franklin Station Project meets Standard 10: While there is little likelihood that the proposed new addition and any related new construction would be removed in the future, if so, the essential form, elements, materials and spatial relationship of the identified historic building would remain.

The Project would be required to incorporate the above measures and with the implementation of MM 4.D-1, impacts to historic architectural resources would be reduced to a less than significant level. Based on the analysis above and incorporation of MM 4D.-1, the Franklin Station Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5. As such, the impacts of the proposed Project would not be substantially more severe than those analyzed in the DNSP EIR. Because none of the criteria set forth under CEQA Guidelines Section 15162(a)(3)(A)-(D) are met, no further environmental analysis is required under CEQA Guideline Section 15162 (a)(3).

The Historic Resource Evaluation also analyzed the proposed project's relation to separate historic structures on the subject block and an adjacent block, The Uptown Theatre and the First Presbyterian Church. It concluded that adherence to the existing Historic Guidelines addresses those structures. Therefore, the Project would have less than significant impacts on the historic building at 1202 First Street/1005 Coombs Street.

b) The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

The EIR found that development facilitated by the DNSP could potentially affect Napa's Native American archaeological resources. The EIR reviewed records and literature on-file at the NWIC, which indicated that no prehistoric or historic-period archaeological resources have been previously recorded within the Planning Area. However, remnants of Native American civilization have been discovered all along Napa Creek and its tributaries, both outside of the Planning Area and within portions of the Planning Area with moderate and high sensitivity for archaeological resources. Additionally, while historic-period development within the Planning Area may have covered and/or disturbed prehistoric archaeological materials, there is potential for obscured or deeply buried archaeological resources.

The City of Napa in certification of the DNSP EIR adopted MMs 4.D-2a and 4.D-2a. The DNSP EIR found that implementation of MM 4.D-2a and MM 4.D-2b would reduce potential impacts to archaeological resources to a less than significant level.

The Franklin Station Project would involve excavation as a result of the construction portion of the Project. Therefore, the construction of the Franklin Station Project could potentially affect Napa's Native American archaeological resources. Implementation of MM 4.D-2a and MM 4.D-2b prior to and during construction would reduce potential impacts to any such archaeological resources to a less than significant level. Therefore, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The EIR found that development facilitated by the DNSP could potentially adversely affect unidentifiable paleontological resources. The EIR analyzed that impacts to paleontological resources would depend on both the degree of excavation that may occur as a result of a construction project allowable under the Specific Plan and the paleontological sensitivity of the area. The depth of excavation required to construct foundations for mixed-use, medium density structures is likely to be greater than the depth of existing fills and disturbed soils. While no information exists to refute or confirm the presence of fossils beneath the Planning Area, because the majority of the Planning Area is underlain by a geologic unit (Pleistocene alluvium) with high paleontological potential, the EIR concluded that subsurface excavations beyond previously disturbed soils could disturb or destroy paleontological resources. Therefore, impacts to paleontological resources could be potentially significant.

The City of Napa in certification of the DNSP EIR adopted MM 4.D-3. The DNSP EIR found that MM 4.D-3 would reduce this impact to a less-than-significant level by educating earth moving crews on the appearance of fossils, procedures to follow if any are discovered, and ensuring that a paleontologist assess the significance of any fossil find, and recovers it, if appropriate.

The Franklin Station Project would involve excavation as a result of the construction portion of the Project. The depth of excavation required to construct the foundation may be greater than the depth of existing fills and disturbed soils at the Post Office, Ace and Parking Lot locations and could impact paleontological resources. Implementation of MM 4.D-3 prior to any subsurface construction would reduce this impact to a less-than-significant level. Therefore, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

d) The Project would not disturb any human remains, including those interred outside of formal cemeteries.

The EIR found that development facilitated by the Specific Plan could potentially disturb any human remains, including those interred outside of formal cemeteries. The EIR states that although unlikely to occur, development facilitated by the proposed Specific Plan could disturb any human remains, including those interred outside of formal cemeteries, as such remains could exist anywhere in Downtown.

The City of Napa in certification of the DNSP EIR adopted mitigation measures 4.D-4. The EIR found that implementation of MM 4.D-4 would mitigate this impact to a less-than-significant should construction activities result in the inadvertent discovery of human remains.

The Franklin Station Project would involve excavation as a result of the construction portion of the Project. Therefore, the construction of the Franklin Station Project could potentially impact human remains. Implementation of MM 4.D-4 prior to and during construction would reduce potential impacts to any such inadvertent discovery of human remains to a less than significant level. Therefore, the Project would not disturb any human remains, including those interred outside of formal cemeteries.

DNSP Mitigating Policies and Implementing Programs

Franklin Station shall comply with the following Mitigation Measures and Implementation Procedures:

- MM 4.D-1
- MM 4.D-2a
- MM 4.D-2b
- MM 4.D-3
- MM 4.D-4

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant cultural resources impacts that were not evaluated in the DNSP EIR.

3. The proposed Project would not result in an increase in the severity of a previously identified significant cultural resources impact.
4. Although there is new information, the no new information is not the type of new information of substantial importance showing that significant cultural resources impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
6. Geology and Soils *Would the project:*				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction	☐	☐	☐	☒
iv) Landslides	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil.	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to geology and soils resources and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new or substantially more severe significant environmental effects relating to geology and soils that were not identified and addressed in the DNSP EIR.

a) The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

The Specific Plan, combined with other present and foreseeable development in the area, might result in increased population and development in a region susceptible to seismic risks and hazards. While the number of people visiting, living and working in the area might increase incrementally, exposing additional people to seismic and geologic hazards, the risk to people and property would be reduced through the upgrading or demolishing of older buildings that were constructed under less stringent building code requirements. Older buildings would be seismically retrofitted and newer buildings would be constructed to stricter building codes. Based on the analysis below, the Project would not expose people or structures to potential substantial adverse effects. The Project would reduce risks by removing and rehabilitating the current earthquake damaged building from the site and removal of the other building from the site to be replaced by new structure and additions meeting current codes.

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

The faults most susceptible to earthquake rupture are active faults, which are faults that have experienced surface displacement within the last 11,000 years. The EIR concluded that there are no active faults that cross the Planning Area, and the nearest active fault (West Napa) is at least four miles away. Therefore, the potential for fault rupture to affect the Planning Area is very low. However, a 6.0 earthquake early in the morning on August 24, 2014, located near Napa caused extensive damage to both interior and exterior to the building.

Under the analysis in the DNSP EIR, the Project would not expose people or structures to rupture of a known earthquake fault because the Project is located in the Planning Area with no active faults, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. As further described below, and in light of the damage cause to the building by the 2014 earthquake, exposure of people or structures to risk or damage to a fault rupture would be minimized through the application to the building addition of current industry standard geotechnical practices and seismic structural design according to the requirements found in the most recent version of the California Building Code, which includes or exceeds the requirements of the Uniform Building Code or International Building Code. The California Building Code requires investigation of subsurface materials and engineering characteristics prior to issuance of the building permit. Because of this and that the site is not within a delineated area on the most recent Alquist Priolo Earthquake Fault Zoning Map, Franklin Station would not expose people or structures to rupture of a known earthquake fault.

ii) Strong seismic ground shaking.

According to modeling conducted by the US Geological Survey in conjunction with the California Geological Survey, the San Francisco Bay Area would likely experience at least one major earthquake with a greater than moment magnitude 6.7 within the next 30 years. The intensity of such an event

would depend on the causative fault and the distance to the epicenter, the magnitude, the duration of shaking, and the characteristics of the underlying geologic materials. The potential for damage or loss during an earthquake of this magnitude was considered a potentially significant impact in the EIR. The DNSP EIR discussed that the potential for damage and loss is lessened by new development being subject to current California Building Code.

Ground shaking in the Planning Area has a 1 in 475 chance of exceeding 0.45g each year. Ground shaking of this magnitude could cause significant damage in structures that are not adequately engineered. See discussion of Impact a) i), above. The California Building Code requires investigation of subsurface materials and engineering characteristics prior to issuance of the building permit. The Franklin Station Project is required to comply with the California Building Code. Because of this and the reasons explained in Impact a) i), above, the Project would not expose people or structures to strong seismic ground shaking.

iii) Seismic related ground failure, including liquefaction.

Liquefaction typically occurs in areas underlain with loose, saturated, cohesionless soils within the upper 50 feet of subsurface materials. These soils, when subjected to ground shaking, can lose their strength resulting from the buildup of excess pore water pressure causing them to behave closer to a liquefied state. In general, liquefaction susceptibility in the Planning Area varies widely and areas such as those located closer to the Napa River could be prone to liquefaction hazards. The Franklin Station Project would be built on compacted soils and is not located near the Napa River. The California Building Code requires investigation of subsurface materials and engineering characteristics prior to issuance of the building permit. The Project would be required to comply with the California Building Code. Because of this, Franklin Station would not expose people or structures to seismic related ground failure, including liquefaction.

iv) Landslides.

The Planning Area contains slopes that are less than 15 percent in grade and not considered susceptible to landslides or slope failure (Napa, 2009). The gentle sloping topography of the area puts the potential for landslides or slope failure to affect any of the proposed development or redevelopment in the Planning Area very low and was therefore not discussed further in the EIR. The Project would be located on flat, developed land with slopes less than 1 percent. Therefore, it would not expose people or structures to landslides.

b) The Project would not result in substantial soil erosion or the loss of topsoil.

The Franklin Station site is currently developed with the land area covered by impervious surface such as asphalt, buildings, and concrete. The relatively flat topography of the Project site significantly reduces the potential for erosion and loss of topsoil during construction activities.

The EIR found that protection of soils during construction can generally be achieved through well-established erosion control measures. Every construction project in the State of California that causes a disturbance of one acre or more of soil through grading, clearing, and or excavation is subject to the General Construction Stormwater Permit (General Construction Permit), also referred

to as the General Permit, adopted by the State Water Resources Control Board (SWRCB). In order to complete the General Permit application, Franklin Station must first submit a Notice of Intent (NOI) to obtain coverage under the General Permit. This General Permit requires dischargers to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies the Best Management Practices (BMPs) that would prevent construction pollutants, including sediment, from reaching storm drains, with the intent of keeping all products of erosion from moving off-site into receiving waters. Furthermore, the SWPPP would also include BMPs to control erosion associated with grading, trenching, and other ground surface-disturbing activities (See also discussion of SWPPP in Hydrology and Water Quality). As a condition of the permits required for the Project, which would require compliance with the requirements of the General Permit. Therefore, impacts from Franklin Station's construction would not result in substantial soil erosion or loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse.

The EIR found differential settlement could occur throughout the Planning Area where the engineering characteristics of underlying materials vary over an area proposed for new loading. Materials most susceptible to settlement would be undocumented fill materials that did not receive adequate compaction or loose unconsolidated alluvial or floodplain deposits. Differential settlement could damage building foundations and roads, and could affect underground utilities. Settlement would be a concern in redevelopment areas that have not previously supported structures and where new structures would place loads heavier than the soils could tolerate.

For Franklin Station, all of the ground failure seismic hazards are minimized through the application of current industry standard geotechnical practices and seismic structural design according to the requirements found in the most recent version of the California Building Code, which includes or exceeds the requirements of the Uniform Building Code or International Building Code. The California Building Code requires investigation of subsurface materials and engineering characteristics prior to issuance of the building permit. Franklin Station is required to comply with the California Building Code. Because of this, Franklin Station would not expose people or structures to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

The EIR found that typically soils that exhibit expansive characteristics are found within the upper five feet of ground surface. Over a long-term exposure to wetting and drying cycles, expansive soils can experience volumetric changes. The effects of expansive soils could damage foundations of above-ground structures, paved roads and streets, and concrete slabs. This upper five feet would be subject to excavation and new engineered compacted soils for Franklin Station's construction.

For Franklin Station, all of the ground failure seismic hazards are minimized through the application of current industry standard geotechnical practices and seismic structural design according to the requirements found in the most recent version of the California Building Code, which includes or exceeds the requirements of the Uniform Building Code or International Building Code. The California Building Code requires investigation of subsurface materials and engineering characteristics prior to issuance of the building permit. Franklin Station is required to comply with the California Building Code. Because of this, Franklin Station would not expose people or structures to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

No septic tanks or alternative wastewater disposal systems are or would be on the Project site. Because Franklin Station does not require the use of septic or other alternative disposal wastewater systems, this section is not applicable.

Mitigating Policies and Implementing Programs

No Mitigation Measures are required.

A number of policies and objectives found in the City of Napa General Plan would help ensure that any new development would be built to standards that reduce their risk from seismic hazards. They include Policies HS-1.1 through HS-1.6 (listed in the EIR's Regulatory Framework section), which generally restricts development in areas of high hazards as determined by required geotechnical investigations unless special construction features are incorporated into the design. Although damage and injury cannot be completely avoided during a significant seismic event, policies outlined in the General Plan and those required by the City of Napa Building Division which has adopted the California Building Code would reduce the potential damage and personal injury. Franklin Station is required to comply with these Building Code requirements.

Policies found in the City of Napa General Plan would help ensure that any new development would be built to standards that reduce their risk from geologic hazards such as unstable soils and erosion. Policy HS-1.3 combined with the building code requirements made by the Building Division would require detailed investigation of subsurface materials and their engineering characteristics. These geotechnical investigations would consider proposed plans and evaluate potential hazards and provide recommendations for construction. Current geotechnical engineering practices have incorporated effective measures in accordance with building code requirements to reduce potential damage and personal injury from geologic hazards by ensuring that industry standard controls are implemented in any future development.

The EIR found that implementation of the Specific Plan in accordance with the policies of the City of Napa General Plan, in addition to the provisions of the California Building Code, would reduce the potential hazards associated with seismic ground shaking and ground failure. Other current and future development/redevelopment projects in the region would similarly be required to adhere to

standards and practices that include stringent geologic and seismic hazard mitigations. With implementation of these required building standards, the impacts of geologic hazards and seismic ground shaking would be reduced to less than significant level.

Franklin Station would be designed and constructed in a manner that is consistent with the development analyzed in the EIR. The Franklin Station Project would comply with the California Building Code as a condition of approval.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant geology and soils impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant geology and soils impact.
4. There is no new information of substantial importance showing that significant geology and soils impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
7. Hazards and Hazardous Materials *Would the project:*				
a. Create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials.	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	☐	☐	☐	☒
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.	☐	☐	☐	☒
e. Result in a safety hazard for people residing or working in the project area or a project within the vicinity of a private airstrip or within an airport land use plan.	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	☐	☐	☐	☒
g. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to hazards and hazardous materials and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new or substantially more severe significant environmental effects relating to hazards and hazardous materials that were not identified and addressed in the DNSP EIR.

a) The Project would not create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials.

The Franklin Station Project involves the rehabilitation and redevelopment of an existing older structure. The Franklin Station Project would be required to adhere to appropriate identification and abatement procedures by certified contractors who employ practices that limit the exposure of hazardous building materials, where present.

The EIR also evaluated whether temporary construction activities associated with development under the DNSP may involve the transport and use onsite of hazardous materials, such as limited quantities of gasoline, diesel fuel, hydraulic fluid, solvents, oils, and paints for the construction of individual, projects within the Planning Area. These materials would be transported along the roadways and temporarily stored onsite. Containment and spill cleanup is encompassed in the SWPPP to prevent hazardous materials from spreading off the property. Therefore, as a condition of construction, compliance with existing regulations would address potential upsets and accidents limiting the potential impacts to less than significant, and no mitigation was required.

The EIR analyzed whether demolition of any existing structures, especially older structures, where such hazardous building materials were commonly used in construction, could be released during demolition activities and expose construction workers, the public, or the environment. The EIR noted that there are established measures that certified contractors commonly use to contain, store, and dispose of these hazardous materials in a manner that limits exposure. Because development under the DNSP would employ appropriate handling and demolition procedures, including conducting thorough surveys to identify the presence of these materials, and adhering to applicable regulations pertaining to particular types of contaminants, adherence to these existing regulations would reduce the potential for hazardous building materials to impact the environment or the public. Therefore, the EIR found this to be a less than significant impact not requiring mitigation. Under these existing regulations, a condition of construction for Franklin Station is to adhere to appropriate identification and abatement procedures by certified contractors who employ practices that limit the exposure of hazardous building materials, where present.

b) The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The EIR discussed that proposed development facilitated under the DNSP would be expected to increase commercial, retail, and hotel land uses and could involve a range of increased chemical products that are considered hazardous materials or hazardous waste. The Franklin Station Project includes commercial, retail, and hotel land uses that may include increased use of hazardous chemicals. Exposure to hazardous chemicals through improper handling or through accidental upset conditions could cause acute or chronic health effects to the public and environment. Hazardous materials would be handled and used in accordance with applicable regulations by personnel that have been trained in the handling and use of the material and that have received proper hazard-communication training. Hazardous materials reporting (i.e. California Hazardous Materials Business Planning, California Proposition 65 notification, and Emergency Planning and Community-Right-to-

Know Act reporting) would be completed as required. The net result of compliance would be the reduction of risks and hazards to workers, the public, and the environment to levels the EIR determined are acceptable. In addition, the EIR noted that General Plan policies (HS-7.1 through HS-7.3) and existing regulatory requirements, such as RCRA "cradle to grave" requirements for hazardous materials and the County's Hazardous Materials and Waste Management Plan, that would establish minimum standards or businesses handling hazardous materials. This regulatory framework requires that hazardous materials are stored, handled, and disposed of according to the Hazardous Materials and Waste Management Plan of Napa County and restrictions on facilities handling large quantities of hazardous materials would be placed. Based on the existing regulatory framework for the use of chemical products, the EIR concluded this would be a less than significant impact with no mitigation was required.

As described in Cultural Resources, above, the Project would include the removal of approximately 4/5ths of the structure from the site, leaving the identified historic features of the building front to a depth equal to and inclusive of the depth of the existing interior lobby. The Franklin Station Project would involve construction to and within the retained building and new construction. The new construction would include adaptive reuse and rehabilitation that would include a building addition to the retained portion of the building located behind the structure. The addition would be allowed to be taller than and wider than the resource, up to the City Height limits and property setbacks. The new construction would also include the parking structure. The demolition and new construction could include use and onsite storage of substances including gasoline, diesel fuel, hydraulic fluid, solvents, oils, and paints. As a condition of construction, the Franklin Station Project would be required to comply with existing regulations that would address potential upsets and accidents. Therefore, Franklin Station would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The Franklin Station Project would not involve the type of industrial uses that would emit hazardous material, substances or wastes. The proposed uses in the Planning Area would not include any hazardous emissions or handle hazardous materials, substances or waste such that it would put occupants of the school at risk. Therefore, Franklin Station would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d) The Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

The Franklin Station site in not included in the above-referenced list. Therefore, this section is not applicable.

e) The Project would not result in a safety hazard for people residing or working in the project area or a project within the vicinity of a private airstrip or within an airport land use plan.

The closest airstrip or airport to the Planning Area is well outside of the Planning Area. The DNSP is outside the Airport Land Use Plan. Therefore, Franklin Station would not result in a safety hazard for people residing or working in the Project area or a project within the vicinity of a private airstrip or within an airport land use plan.

f) The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Project would comply with all emergency vehicle access requirements. The EIR concluded that the implementation of the DNSP would not impede an established emergency access route or interfere with emergency response requirements and would not result in permanent road closures. Because the Franklin Station would comply with the City's emergency requirements, it would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) The Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The EIR found that the Planning Area is located within an urbanized area that is not immediately adjacent to any wildlands. All construction associated with the Specific Plan would be required to adhere to Building Fire Codes designed to minimize the potential for uncontrolled fires. Because Franklin Station adheres to such codes and is located in the Planning Area it would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The Franklin Station Project would not result in impacts to hazards and hazardous materials that have not already been addressed in the EIR.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant hazards and hazardous materials impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant hazards and hazardous materials impact.
4. There is no new information of substantial importance showing that significant hazards and hazardous materials impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
9. Hydrology and Water Quality *Would the project:*				
a. Violate any water quality standards or waste discharge requirements.	☐	☐	☐	☒
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or proposed uses for which permits have been granted).	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or increasing the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.	☐	☐	☒	☐
e. Create or contribute substantial runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	☐	☐	☒	☐
f. Otherwise substantially degrade water quality.	☐	☐	☐	☒
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam.	☐	☐	☐	☒
j. Result in inundation by seiche, tsunami, or mudflow.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to hydrology and water quality and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new or substantially more severe significant environmental effects relating to hydrology and water quality that were not identified and addressed in the DNSP EIR.

a) The Project would not violate any water quality standards or waste discharge requirements.

The DNSP EIR analyzed the existing hydrologic resources and the state of water quality in and near the Planning Area and the State and local regulations that would apply to implementing the DNSP. The EIR also provided an assessment of regional and local hydrological resources and water quality that could have an effect on the DNSP.

The EIR analyzed whether development facilitated by the DNSP could potentially violate water quality standards, violate waste discharge requirements, or otherwise degrade water quality by increasing nonpoint source pollutants in stormwater runoff. It concluded pollutants in stormwater runoff associated with development under the DNSP would be minimized with adherence to the various guidelines, ordinances, and permit requirements discussed in the EIR. Design standards applicable under the DNSP would be the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance, which include pollutant source control features such as use of landscaped areas for infiltration of stormwater, permeable paving, stormwater detention basins, and parking lots with bio-infiltrations systems. The EIR concluded that incorporation of these design features would ensure that development facilitated under the DNSP would improve the water quality of runoff directed offsite to downstream receiving waters. The EIR concluded that this potential impact would be a less than significant and would not require mitigation.

The Franklin Station Project site currently is developed with structures and impervious surfaces. As a condition of approval, the Franklin Station Project must comply with the City's Storm Water Management Plan, Stormwater Runoff Pollution Control Ordinance, and the DNSP Design Guidelines. Therefore, Franklin Station would not violate any water quality standards or waste discharge requirements.

b) The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or proposed uses for which permits have been granted).

The EIR considered potential development under the DNSP, current conditions at the Planning Area, and applicable regulations and guidelines. The EIR concluded that the above CEQA criteria was not considered relevant to the DNSP based upon the program level analysis of this EIR, the geographic context of the Planning Area, and data research. The EIR reviewed several criteria and concluded that the DNSP would not result in impacts, because underlying groundwater aquifer in the Planning Area is not used for water supply purposes, no groundwater extraction beyond minor temporary dewatering activities that may be required for construction facilitated by the DNSP, the Planning

Area is largely developed and covered in impervious surfaces and the DNSP includes stormwater management guidelines encouraging design features that would increase pervious surfaces and, as a result, groundwater recharge. Therefore, it concluded there is no adverse potential impact associated with development facilitated by the DNSP relative to the depletion of groundwater supplies.

The Franklin Station Project fits all if these criteria. Because of this, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or proposed uses for which permits have been granted).

c) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.

The EIR analyzed whether development facilitated by the DNSP could potentially alter existing drainage patterns, causing downstream erosion, siltation, or flooding. It found that new development on vacant sites could alter existing drainage patterns to accommodate proposed site design. Development would also cause erosion, such as when ground is cleared for construction, resulting in the siltation of creeks and reduction of their capacity to accommodate stormwater. The EIR concluded development under the DNSP would include design features that incorporate required stormwater management guidelines. While these design features might alter the drainage patterns; however, they would likely result in a net reduction in stormwater flows offsite through the addition of pervious surfaces.

The Franklin Station site is already developed and covered primarily by buildings. The Project would be required to incorporate stormwater management guidelines (see Impact a) above) and design features. With the Project's developed site, location in downtown not adjacent to creeks or drainages, and incorporation of stormwater management guidelines, it would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.

d) The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or increasing the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

The EIR discussed that site-specific project plans would be required to adhere to the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance. These require source controls of stormwater volumes either through detention or local infiltration. The EIR found that adherence to these existing stormwater requirements would generally improve drainage facilities over existing conditions, require erosion and sedimentation control measures for construction and operation, comply with the local Storm Water Management Plan, and require design standards that would reduce the amount of stormwater going offsite to the extent practical. Based on this, the EIR found the impact to be less than significant.

Because Franklin Station is required to adhere to the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance, it would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or increasing the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

e) The Project would not create or contribute substantial runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The EIR found that incorporation of the City's guidelines, ordinances, and permit requirements would ensure that new development or redevelopment projects facilitated by the DNSP would limit the amount of runoff that would be directed offsite and could even reduce volumes over existing conditions. Because Franklin Station must incorporate the City's stormwater guidelines, ordinance and permit requirements into its design, it would not create or contribute substantial runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

f) The Project would not otherwise substantially degrade water quality.

The EIR analyzed whether development facilitated by the DNSP, on a cumulative basis, could potentially introduce additional non-point source pollutants to surface waters that would degrade water quality. It found that development facilitated by the DNSP could result in indirect cumulative impacts on water resources by accommodating future planned urban development that would have the potential to alter drainage patterns and impact water quality. Any increases in impervious surfaces could create higher erosion rates as well as reduce groundwater recharge. The DNSP and other present and future projects in the region are required to comply with drainage and grading ordinances intended to control runoff and regulate water quality at each development site, and new projects would be required to demonstrate adequate capacities of stormwater volumes that would be managed by downstream conveyance facilities.

The City's Storm Water Management Plan, Stormwater Runoff Pollution Control Ordinance, and National Pollution Discharge Elimination System (NPDES) permitting requirements apply throughout the Planning Area. The EIR concluded that because final design plans for individual project would be required to include storm water management features that address stormwater quantity and quality and that would minimize the potential for adverse impacts of receiving waters, the effect of the DNSP on water quality and hydrology, in combination with other past, present, and foreseeable projects would not be significant.

The Franklin Station is subject to the City's Storm Water Management Plan, Stormwater Runoff Pollution Control Ordinance, and NPDES. Franklin Station's final construction plans are required to include stormwater management features that address stormwater management features that address stormwater quality and quality that minimize pollutants in receiving waters. Therefore, Franklin Station would not otherwise substantially degrade water quality.

g) The Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

The EIR analyzed whether development facilitated by the DNSP could place housing or structures in the floodplain that could potentially expose people to a substantial risk of loss, injury or death. The EIR recognized that the Napa River Flood Protection Project, which began construction in 2000, includes various flood protection improvements that have effectively lowered the water surface elevation in several areas (Napa, 2009). The City of Napa General Plan contains a number of policies described in the EIR described in the EIR, which would help minimize the flood hazard potential for new development. The EIR concluded that development would be required to adhere to the City's Floodplain Management Ordinance and the Flood Evaluation Area (FEA) land use regulations. Because development facilitated by the DNSP would be required to adhere to these regulations combined with the continued improvements associated with the Napa River Flood Protection Project, the EIR found this impact to be less than significant and did not require mitigation.

With the potential for branded residential housing in in the Franklin Station Project, the Project would be required adhere to any applicable Floodplain Management Ordinance and the FEMA land use regulations.

h) The Project would not place within a 100-year flood hazard area structures that would impede or redirect flood flows.

The EIR analyzed whether development facilitated by the DNSP could place housing or structures in the floodplain that could potentially expose people to a substantial risk of loss, injury or death. It found that the floodplain hazard areas could also be affected in the future by sea level rise. It is difficult to predict the exact amount of sea level rise and consequently the potential associated hazard due to the likely long time frames necessary before a better understanding of the potential effects is known. The EIR discussed that development facilitated by the DNSP would result in construction of structures including residential land uses within the floodplain and the FEA. The EIR recognized that the Napa River Flood Protection Project, which began construction in 2000, includes various flood protection improvements that have effectively lowered the water surface elevation in several areas (Napa, 2009). The City of Napa General Plan contains a number of policies described in the EIR, which would help minimize the flood hazard potential for new development. The EIR concluded that development would be required to adhere to the City's Floodplain Management Ordinance and the FEA land use regulations. Because development facilitated by the DNSP would be required to adhere to these regulations combined with the continued improvements associated with the Napa River Flood Protection Project, the EIR found this impact to be less than significant and did not require mitigation.

Although Franklin Station contains no housing, the Project would adhere to any applicable Floodplain Management Ordinance and the FEMA land use regulations. Because of this, Franklin Station would not place within a 100-year flood hazard area structures that would impede or redirect flood flows.

i) The Project would not expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam.

The EIR analyzed whether development facilitated by the DNSP could potentially expose people or structures to risk of flooding due to the failure of a dam. Several reservoirs are located within the Napa area including the Lake Hennessey, Lake Milliken Reservoirs, and another dam located at Rector Reservoir. The dams on these reservoirs are under the jurisdiction of the Division of Safety Dams (DSOD). In 1986, the Conn Creek Dam was determined to be of sufficient integrity in the event of a major earthquake (Napa, 2009). In 2008, seismic modifications were made to the Milliken Dam to lower the water height behind the dam. The Rector Reservoir is an earth fill dam that is under the jurisdiction of the State, which also is required to adhere to the maintenance and monitoring required by DSOD. In addition to the DSOD requirements, risks associated with dams in the vicinity of the Planning Area are addressed by several of the policies included in the General Plan and described in the EIR. These policies require inspection and maintenance of water storage facilities, location of essential public facilities outside of potential dam inundation areas, and support measures to conduct periodic inspections of local dams as well as provide protection of public and private properties from dam inundation. Therefore, the EIR concluded the risk of flooding due to dam failure was be less than significant and did not require mitigation.

The Project is not located in an area near levees or dams. The flood control project in downtown Napa was designed to alleviate flooding risks. Under the general analysis in the DNSP EIR, Franklin Station would not expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam.

j) The Project would not result in inundation by seiche, tsunami, or mudflow.

The EIR concluded that the Planning Area is located in an inland area that is not within an area subject to seiches, tsunamis or mudflows. Therefore, there would be no impact associated with these hazards.

Because Franklin Station is located in the Planning Area, it would not result in inundation by seiche, tsunami, or mudflow.

Mitigating Policies and Implementing Programs

No mitigation is required because Franklin Station is required to adhere to the City's regulations and ordinances described above, and also is required to adhere to state and federal standards described above.

The DNSP EIR contains a description of applicable General Plan policies related to hydrology and water quality applicable to Franklin Station through the adoption of the DNSP.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.

2. The proposed Project would not result in new significant hydrology and water quality impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant hydrology and water quality impact.
4. There is no new information of substantial importance showing that significant hydrology and water quality impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
10. Land Use and Planning *Would the project:*				
a) Physically divide an established community.	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to land use and planning and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to land use and planning.

a) The Project would not physically divide an established community.

The EIR considered whether development facilitated by the DNSP could potentially result in the physical division of an established community. The EIR found that the DNSP proposed land use designations themselves would not create any new physical barriers in the Planning Area. The DNSP and development facilitated by the DNSP does not include major planned roadways, such as freeways, that would divide Planning Area, or individual neighborhoods or subareas. Conversely, the DNSP includes objectives that would increase connectivity within the Planning Area, including development of a human-scale, pedestrian-friendly environment; cultivation of a multi-modal transportation network incorporating pedestrians, bicycles, public transportation, as well as automobiles; and creation of linkages to and between public gathering spaces, parks, and the Napa River. The EIR concluded new land uses proposed by the Specific Plan would not result in divisions either within Downtown or with adjacent neighborhoods adjacent to Downtown and implementation of the DNSP would result in a less than significant impact regarding the physical division of an established community.

The DNSP would also concentrate intensive commercial development in a new Downtown Core Commercial land use designation within the primary existing retail area, and provide for sensitive transition to adjacent residential areas that surround the Planning Area. Franklin Station would be built in the commercial core. Franklin Station would not close any roadway or obstruct public areas. Because Franklin Station is being built on an existing developed site, it would not physically divide an established community.

b) The Project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, DNSP, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Conflicts between a project and applicable policies do not constitute significant physical environmental impacts in and of themselves. A General Plan contains many policies that may address different goals. A policy inconsistency is considered a significant adverse environmental impact only when it is related to a policy adopted for the purpose of avoiding or mitigating an environmental effect, and it is anticipated that the inconsistency would result in a significant adverse physical impact based on the established significance criteria. The EIR found that the DNSP could conflict with a General Plan policy, and to the extent it does those potential physical conflicts are noted in the EIR impact analysis sections (e.g., Biological Resources, Hydrology and Water Quality, etc.). The EIR noted that the compatibility of the DNSP with General Plan policies that do not relate to physical environmental issues would be considered by decision-makers as part of their decision whether to approve or disapprove the DNSP.

The EIR found that the DNSP land use districts would not represent a substantial departure from the existing controls such that incompatible land uses would be developed. Future development allowed by these new districts would result in a more cohesive Downtown core commercial area that transitions to mixed-uses and residential areas extending outward to the residential neighborhoods surrounding the Downtown Planning Area. The EIR concluded development facilitated by the DNSP would not conflict with any applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect.

The Franklin Station Project site is located within the DNSP Planning Area. The Project approvals required from the City of Napa include a General Plan Amendment, Specific Plan Amendment, Certificate of Appropriateness and Zoning Amendments to rezone the Post Office Parcel from DP to DMU/PD (Planned Development Overlay), the Parking Lot Parcel from DMU to DMU/PD, and the Ace Parcel from DMU to DMU/PD.

The three properties comprising the proposed development site are all currently located within the Downtown II Building Form Zone in the DNSP, which allows medium to high density development. The three subject parcels currently have a development potential of 4.0 Floor Are Ratio (FAR) within the DNSP. The proposed General Plan Amendment and DNSP Zoning Amendment associated with the proposed development would not change or increase the overall the development potential of the properties as the 4.0 FAR would remain as the maximum development potential as currently allowed in the DNSP.

Consistent with the DNSP EIR analysis, the Project's proposed General Plan Amendment, Specific Plan Amendment, Zoning Amendments and Planned Development Overlay would not represent a substantial departure from the existing controls such that land uses incompatible with the DNSP would be developed. The changes proposed by the Project would still be within the intensity of development already contemplated by the DNSP for the DMU and DP Districts within Downtown II Building Form Zone applicable to the site and evaluated in the DNSP EIR, which would include

aspects of the DNSP intended to mitigate environmental effects. The Post Office Portion of the Project site was not zoned DMU at the time of the DNSP adoption because it was a government use not expected to change. However, following the 2014 earthquake, the federal government decided to discontinue the governmental use and relocate the Post Office services. The DNSP did not anticipate the Project to be used for any residential or other use with which the proposed Project would conflict. The future development proposed by the Project would result in a more cohesive Downtown core commercial area within the Downtown Planning Area.

Because government uses are no longer contemplated for the site and because the development proposed by the Project is consistent with the commercial development anticipated by the DNSP and specifically within the Downtown II Building Form Zone applicable to the site, the Project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

c) The Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

Franklin Station would not conflict with any applicable habitat conservation plan or natural community conservation plan. See the Biological Resources section discussion of criteria for analysis.

Mitigating Policies and Implementing Programs

No Mitigation Required.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant land use and planning impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant land use and planning impact.
4. There is no new information of substantial importance showing that significant land use and planning impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
11. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

The DNSP EIR found that the implementation of the Specific Plan would have no impact on mineral resources. This is because the Planning Area is located in a developed urban area that has no known existing mineral resources. The California Geological Survey has classified lands within the San Francisco Bay Region into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act (SMARA) of 1974 (Stinson et al., 1982). The Planning Area is mapped by the California Department of Mines and Geology as MRZ-1, an area where adequate information indicates a low likelihood of significant mineral resources (Stinson, et al., 1982). The intent of designating significant deposit is to identify areas where mineral extraction could occur prior to development. The DNSP EIR concluded that implementation of the Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Because Franklin Station is located on developed urban and built-up land in the Planning Area, it would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

b) The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

For the reasons explained above and because Franklin Station is located on developed urban and built-up land in the Planning Area it would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Mitigating Policies and Implementing Programs

There are no applicable mitigation measures or policies because neither the DNSP nor Franklin Station would have impacts on mineral resources.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant land use and planning impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant land use and planning impact.
4. There is no new information of substantial importance showing that significant land use and planning impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
12. Noise and Vibration *Would the project result in:*				
a. Conflict with land use compatibility guidelines for land uses contained in the Napa General Plan (shown in Figure 4.I-3); noise levels at new receptors that would be above the "normally acceptable" level are considered in conflict with the compatibility guidelines.	☐	☐	☐	☒
b. Increased noise along existing and new roadways to levels that exceed 65 L_{dn} ("normally acceptable"), as shown in Figure 4.I-3 and a traffic noise increase of at least 3 A-weighted decibel (dBA).	☐	☐	☐	☒
c. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.	☐	☐	☒	☐
d. Exposure of people residing or working in the Planning Area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or a private airstrip.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to noise and vibration and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to noise and vibration.

a) The Project would not conflict with land use compatibility guidelines for land uses contained in the Napa General Plan (shown in Figure 4.I-3); noise levels at new receptors that would be above the "normally acceptable" level are considered in conflict with the compatibility guidelines.

The DNSP EIR evaluated whether the build out of the Planning Area would result in potentially significant environmental impacts as it relates to noise. The EIR used Metrosonics Model db3080 sound level meters to obtain short-term noise measurements. The meters were calibrated to ensure the accuracy of the measurements. Ten short-term (ST) noise level measurements were taken in the vicinity of the Planning Area to determine the existing noise level in the area. This noise survey was conducted to assess the significance of project-related noise impacts by comparing estimated project-related noise levels to existing noise levels. The data gathered from the meters includes all noise (background and intermittent noises) at the microphone and does not separate different audible sources. The noise measurement locations and the results were included in the DNSP EIR.

The EIR found that the existing noise environment is dominated largely by transportation noise including vehicles, buses, the Napa Wine Train, motorcycles, and an occasional airplane. Pedestrians and music coming from car stereos also contribute to the noise environment.

The EIR discussed that some land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, parks and other outdoor recreation areas generally are more sensitive to noise than are commercial (other than lodging facilities) and industrial land uses. The EIR found that future noise levels related to construction within and adjacent to the Planning Area would fluctuate depending on the particular type, number and duration of uses of various pieces of construction equipment. Construction equipment is typically diesel powered, and is used to excavate, transport heavy materials, and remove debris and waste. Construction noise is typically short-term, but can be very loud. Noise from machinery or equipment is a potentially significant impact, especially near sensitive receptors.

Franklin Station's construction activities would involve excavation, grading, demolition, drilling, trenching, earth movement, and vehicle travel to and from the Project site. To reduce impacts Franklin Station must incorporate best available noise control techniques into its construction and grading plans.

To reduce construction noise impacts to less-than-significant levels, the DNSP EIR requires that MMs 4.I-1a through 4.I-1c would be incorporated by Franklin Station into its grading and construction plans. By incorporating the mitigation measures, Franklin Station would not conflict with land use compatibility guidelines for land uses contained in the Napa General Plan (shown in Figure 4.I-3); noise levels at new receptors that would be above the "normally acceptable" level are considered in conflict with the compatibility guidelines.

b) The Project would not subject people to increased noise along existing and new roadways to levels that exceed 65 L_{dn} ("normally acceptable") and a traffic noise increase of at least 3 dBA.

The EIR analyzed increased traffic volumes and congestion on local roadways, coupled with roadway improvements proposed in the Specific Plan. It concluded that the DNSP implementation could increase traffic noise levels. However, the DNSP EIR concluded that no road segment in the entire Planning Area would experience future increase in traffic noise levels by more than three A-weighted decibel (dBA) from 2035 "no Plan" to 2035 "with the Plan." The predicted increase in traffic noise was therefore considered a less than significant impact and no mitigation was required.

Because Franklin Station's traffic levels are within those anticipated by the DNSP and within the amounts analyzed in the EIR, and because construction noise must comply with the Mitigation Measures described above, Franklin Station would not expose people to increased noise along existing and new roadways to levels that exceed 65 L_{dn} ("normally acceptable") and a traffic noise increase of at least 3 dBA.

c) The Project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels.

The DNSP EIR evaluated the impacts of excess groundborne vibration or noise levels. Increased exposure to sources of groundborne vibration could occur through increased residential or employment densities on lands within proximity to noise generating activities (commercial, railroad, construction). Specifically, vibration created through construction activities could result in potentially significant impacts on existing or proposed sensitive land uses.

Franklin Station is required to comply with the City's Noise Ordinance, Chapter 8.08 of the Napa Municipal Code. To reduce construction noise impacts to less-than-significant levels, the DNSP EIR requires that MMs 4.I-1a through 4.I-1c would be incorporated by Franklin Station into its grading and construction plans. By incorporating the mitigation measures, Franklin Station would not conflict with land use compatibility guidelines for land uses contained in the Napa General Plan (shown in Figure 4.I-3); exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.

d) The Project would not expose people residing or working in the Planning Area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or a private airstrip.

The final criteria (d) was not addressed in the DNSP EIR since there are no airport land use plans, public or private airports of airstrips within five miles of the Planning Area. Because Franklin Station is not located within 2 miles of an airport or airstrip, it would not expose people residing or working in the Planning Area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or a private airstrip.

Mitigating Policies and Implementing Programs

The DNSP EIR concluded that implementation of the Napa General Plan Policies in the Health and Safety Element would reduce the potential for excessive noise from construction activities and Downtown development: Policy HS-9.1, HS-9.2, HS-9.6, HS-9.7, HS-9.8, HS-9.9, HS-9.10, HS-9.11, HS-9.13, HS-9.14.

The DNSP EIR concluded that the implementation of the Napa General Plan Policies in the Health and Safety Element would help reduce the potential for excessive groundborne noise and groundborne vibration: Policy HS-9.2, HS-9.9, HS-9.11, HS-9.14. These policies would ensure that new development does not exceed City standards (HS-9.2), limits construction activities (HS-9.9), protects noise sensitive land uses (HS-9.11), and includes site planning techniques to limit noise and vibration impacts (HS-9.14).

Franklin Station shall comply with Mitigation Measures and Implementation Procedures:

- MM 4.I-1a
- MM 4.I-1b
- MM 4.1-1c

Implementation of the Napa General Plan policy provisions described below would reduce noise exposure impacts to a less than significant level. To reduce construction noise impacts to less-than-significant levels, MMs 4.I-1a through 4.I-1c would be incorporated as conditions of approval for the proposed Project as described in the DNSP EIR. The Franklin Station Project is not within 200 feet of the Wine Train mainline track; therefore MM 4.I-3 is not applicable.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant noise and vibration impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant noise and vibration impact.
4. There is no new information of substantial importance showing that significant noise and vibration impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
13. Population and Housing *Would the project:*				
a. Substantial unanticipated population, housing, or employment growth in excess of local share of regional projections that has the potential to result in adverse physical environmental effects.	☐	☐	☒	☐
b. Displacement of existing residents or housing units.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to population and housing and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to population and housing.

The Franklin Station Project requires the Project development (design, construction and use) to be consistent with the development analyzed in the EIR. As such, the Franklin Station Project would not create new or greater impacts to population and housing that were not disclosed in the DNSP EIR or propose changes that require revisions to that EIR. In addition, no substantial changes with respect to circumstances under which the Project is undertaken or the discovery of new important information has occurred since the EIR was completed and certified that would require revisions to the EIR. Therefore, the Franklin Station Project would not result in any new or more severe impacts with respect to population and housing that were not previously analyzed and disclosed in the DNSP EIR, and no further environmental analysis is required.

As explained below, the Project would not result in any new environmental effects relating to population and housing that were not identified and addressed in the DNSP EIR.

a) The Project would not cause substantial unanticipated population, housing, or employment growth in excess of local share of regional projections that has the potential to result in adverse physical environmental effects.

The EIR's analysis for population, housing and employment evaluated the change in development capacity that would occur as a result of the implementation of the DNSP. The analysis estimates the amount of population, housing, and employment that could be constructed within the Planning Area assuming full buildout of additional commercial uses, with a proposed net increase of 108,580 square feet of retail space, 470,599 square feet of office space and approximately 300-500 additional hotel rooms at full buildout.

The EIR concluded that the DNSP related rezoning would induce growth within the DNSP Area. However, this growth would amount to less than one percent of total citywide growth anticipated in

2035 and is already expected given that the Planning Area is the City's Downtown, where higher-density housing is encouraged by the General Plan.

The EIR evaluated whether the DNSP at full buildout would result in potentially significant environmental impacts as it relates to population, employment, and housing. Descriptions and analysis in this section were based on population and housing information provided by the 2000 U.S. Census, the Association of Bay Area Governments (ABAG), the California Department of Finance, and the City of Napa General Plan 2020, which includes a summary of the City's 2001 Housing Element. ABAG Projections already assume that the population within the County would increase by approximately 5 percent over the next 25 years and growth associated with these projects is already assumed as part of these long-term projections. The DNSP growth inducement impacts were evaluated by determining their consistency with these estimates and projections. The EIR found all project impacts related to population and housing were less than significant.

The DNSP impacts related to inducing population growth, either directly or indirectly, would be less than significant because development envisioned under the DNSP is anticipated and planned for, and would support the goals of the General Plan. The DNSP would allow for future development to occur in an organized manner, with various guidelines used to ensure an appropriate transition between the more intensive Downtown and the less intensive surrounding areas.

The cumulative growth of the DNSP and other foreseeable projects would represent less than ten percent of the City's expected future jobs growth. Such growth is consistent with and would not exceed the most recent ABAG projections. Consequently, the DNSP projected population, housing and jobs growths would not be considered substantial and unanticipated.

Because the Planning Area is located within the City's existing retail and service areas and is currently served by urban infrastructure, services and transit options, the EIR concluded that no new infrastructure would need to be extended into the Planning Area.

These proposed commercial uses would create approximately 1,637 net new additional jobs within the Planning Area if all proposed uses are built out. Since ABAG projects approximately 43,980 jobs in the City of Napa at the time of the project build out, the new jobs generated by the DNSP would constitute approximately four percent of total job stock in the City. An increase in future jobs within the Planning Area is already planned for and expected as part of the City's long-term economic strategy.

The Franklin Station Project would create approximately 75-150 new full-time jobs, which also is within the total job growth of 1,637 employees resulting from the DNSP as analyzed in the EIR. The Franklin Station Project is required to pay affordable housing impact fees pursuant to the Chapter 15.94 of the City's Municipal Code. The Franklin Station Project proposes no change to the land uses for the Planning Area that would result in new population or employment growth other than what analyzed in the EIR. Therefore, the Franklin Station Project would not result in substantial population, housing, or employment growth in excess of that analyzed in the EIR and planned for under local and regional projections.

b) The Project would not cause displacement of existing residents or housing units.

Since areas appropriate for housing have already been identified and planned for, the EIR found that the DNSP would not displace housing or people such that construction of replacement housing would be required elsewhere. Moreover, more units would be built than would be demolished.

The EIR concluded that because the DNSP proposes substantially more residential development than currently exists within the Planning Area or than could be displaced, none of the residents within the existing housing in the area would be expected to be permanently displaced by future redevelopment, since residents would likely be able to occupy new housing added to the area. As noted above, at full buildout, the DNSP could add a net of 627 new housing units to the Planning Area.

Because the Franklin Station Project site currently is developed with commercial, governmental and surface parking uses, the Project would not displace existing residents or housing units. All zoning districts under the Specific Plan allow multi-family residential development as a permitted or conditional use. The Planning Area is 210 acres and densities range from 10 to 25 to 20 to 60 units per acre. The EIR plans for 627 units of housing within the Planning Area. Construction of the Franklin Station Project results in 163 hotel rooms, hotel accessory space (including up to 41 branded residential or condo-hotel), retail, and restaurant within 174,396 square feet of building area, and up to 7,000 square feet of additional retail in the parking structure. The Franklin Station Project does not remove the potential for residential units analyzed under the EIR to be constructed elsewhere within the Planning Area. Therefore, Franklin Station will not displace existing residents or housing units.

Mitigating Policies and Implementing Programs

No Mitigation required.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP Program EIR.
2. The proposed Project will not result in new significant population and housing impacts that were not evaluated in the 2012 DNSP Program EIR.
3. The proposed Project will not result in an increase in the severity of a previously identified significant population and housing impact.
4. There is no new information of substantial importance showing that significant population and housing impacts described in the 2012 DNSP Program EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
15. Recreation and Open Space *Would the project*				
a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to recreation and open space and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to recreation and open space.

a) The Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The DNSP EIR evaluated development facilitated by the DNSP for conformity with the goals and policies of the City's General Plan related to parks and recreation. The EIR concluded that the DNSP, a regulatory program, would not directly physically degrade any existing recreational resources in the Planning Area. The DNSP would facilitate development that would increase the residential population in Planning Area.

The EIR found that unmet demand for parks and recreational resources would not be considered a significant impact on the environment. However, the DNSP would have an adverse environmental impact if it were to cause the deterioration of existing recreational resources through increased use, or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. Increases in the number of permanent residents without development of additional recreational resources could result in proportionately greater use of parks and recreational facilities in the Planning Area, which may result in physical deterioration. However, population increases are only one factor in determining whether parks and recreational facilities would deteriorate through increased use. Other variables include park design, age, infrastructure, how the park is being used, and whether adequate levels of maintenance are provided. The EIR concluded that no Mitigation is required for the implementation of the DNSP.

Existing and planned parkland in the Planning Area (Table 4.K-2 of the DNSP EIR) has not changed since 2012. The development of the Franklin Station Project would not reduce this existing amount of parkland. Conversely, the Franklin Station Project would not involve the construction of park

facilities that would have an adverse impact on the environment. Because Franklin Station would be built at an existing developed commercial site and the only residential use allowed would be as accessory to the hotel that can be used for both transient and longer-term residential occupancy, it would not be expected to increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) The Project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

No specific parks or recreational facilities are proposed by the DNSP, but new parks and open space improvements are currently proposed or planned in Planning Area that would serve residents of development facilitated by the Specific Plan. Additionally, the dedication of parkland/in-lieu fees required of future residential development would reduce the increased demand for parks generated by new residents living in Planning Area. Because Franklin Station would be built at an existing developed commercial site and would not introduce new, typical residents to the site, it would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Mitigating Policies and Implementing Programs

No Mitigation required.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant recreation and open space impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant recreation and open space impact.
4. There is no new information of substantial importance showing that significant recreation and open space impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
16. Transportation/Traffic *Would the project:*				
a. When a signalized intersection operates at midrange LOS D (as allowed by the General Plan in most locations) or better under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS E or LOS F. The project mitigation should bring the facility to operate at midrange LOS D, at a minimum.	☐	☐	☐	☒
b. When a signalized intersection operates at midrange LOS E (as allowed by the General Plan in some locations and for state highway facilities) or better under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS F. The project mitigation should bring the facility to operate at midrange LOS E, at a minimum.	☐	☐	☐	☒
c. When a signalized intersection operates at LOS F (a violation of the General Plan LOS policy) under existing or interim baseline conditions, the addition of more than 50 peak-hour project trips contributes to the continuing operational failure at the intersection. The project mitigation should bring the facility to pre-project conditions.	☐	☐	☐	☒
d. At an unsignalized intersection when the minor stop-controlled approach operates at LOS E or better or has acceptable operation in terms of total control delay, the addition of project trips increases the total control delay to more than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multilane approach. The project mitigation should bring the facility to operate at LOS E or to bring the total control delay to less than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multilane approach, at a minimum.	☐	☐	☐	☒
e. At an unsignalized intersection when the minor stop-controlled approach operates at LOS F and does not have acceptable operation in terms of total control delay the addition of more than 50 peak-hour project trips contributes to the continuing operational failure at the minor approach. The project mitigation should bring the facility to pre-project conditions.	☐	☐	☐	☒

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
f. If the proposed project is on a Crucial Corridor and the property is zoned Traffic Impact Overlay (TI); the project generates more than 520 trips/gross acre/day (or gross floor area equivalent). Uses with higher trip generation characteristics are prohibited unless: i. Adjustments in the gross floor area, gross acreage, operation, etc., are made to reduce the number of trips to an acceptable level as determined by the Public Works Director, or ii. The Public Works Director finds that the transportation benefits of the project clearly outweigh the adverse effect on the crucial corridor. Transportation benefits of the project may include roadway and safety improvements, traffic system management strategies, transit service enhancements, travel demand management strategies, among others.	☐	☐	☐	☒

The Franklin Station Project was examined and compared to the analysis in the DNSP EIR as it pertains to transportation and traffic and, as detailed below, it was determined that the Franklin Station Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to transportation and traffic.

The Franklin Station Project site is fully encompassed within the DNSP Area and would be consistent with the development intensity considered in the DNSP EIR. To fall within the scope of the DNSP, the vehicle trip generation of the Franklin Station Project must fall within the overall parameters for the DNSP established under the DNSP EIR. Site specific trip generation traffic operational impacts from the Franklin Station Project were reviewed in the analysis completed by Kimley-Horn and Associates in their July, 2018 report, Traffic Analysis for Napa Post Office Redevelopment (the "Traffic Report").

As described in the Traffic Report, the Project would result in less trips than the existing and previous land uses developed on the project site and allowed land uses by the DNSP as analyzed in the DNSP EIR. Therefore, the Traffic Report concluded that the Project would have a net decrease in trips in the area and would further bolster the downtown area's vision of retail, residential, and tourism.

The Franklin Street Station Post Office, the Zeller's Ace Hardware store, and the surface parking lot were in use during the creation of the 2012 DNSP. The traffic generated by these uses was included in the baseline traffic conditions for the DNSP EIR. The existing land uses at the proposed Project site area were included in the 2012 DNSP but were not identified for any specific redevelopment. To evaluate the potential traffic effect of the proposed Project, a trip generation comparison between

the existing land uses which were in operation during the 2012 DNSP preparation and the proposed Project land uses was made.

As described in the Traffic Report, the Franklin Station Project would generate a total of 1,627 daily trips, 310 fewer trips than the 1,937 trips generated by the existing land uses on the site. The traffic generated by the Project is less than the daily trips analyzed in the DNSP EIR. The Project is anticipated to generate fewer daily and peak period trips than was attributed to these sites in the baseline conditions used in the DNSP EIR and fewer than the maximum number of trips that would normally be anticipated from buildout of the land use designations assigned to these sites by the approved DNSP. Therefore, the Project would not result in any additional traffic impacts beyond those identified in the DNSP EIR.

Because the Project allows for the hotel to allocate a portion of the total number of rooms to be residential units, the Traffic Report also analyzed impacts from the potential residential units. The proposed allocation is 25 percent of the 163 total rooms, or 41 rooms. According to the Traffic Report multifamily-housing (mid-rise) units have a lower daily trip generation rate than hotel rooms. For example, if 41 residential units replaced 41 hotel rooms, the estimated trips from the multifamily-housing (mid-rise) would generate less daily and peak period trips then hotel rooms would, with the exception of AM outbound trips. According to the Traffic Report, the small increase in AM outbound trips would still be less than the existing land use trip generation for AM outbound travel.

The EIR also evaluated transportation impacts according to certain methodologies and considerations, including proposed and planned transportation improvements. The Franklin Station Project does not propose changes to methodologies or changes to proposed and planned transportation improvements that could result in transportation impacts not previously analyzed and disclosed in the EIR. Based on the analysis described in the Traffic Report, the Franklin Station Project is anticipated to generate fewer trips than assumed in the DNSP EIR and would not result in any additional impacts from trip generation than analyzed in the EIR. In regard to traffic circulation and access, the Project site is surrounded by Randolph Street, Franklin Street, Second Street, and Third Street which are all two-way roadways with one lane in each direction. Vehicular access would be provided via driveways on Randolph Street, Franklin Street, Second Street, or Third Street. The Traffic Report concluded that with the proper configuration of parking spaces and access driveways in accordance with City of Napa Standard Plans and Specifications, the site would provide adequate access and internal circulation for this development. It further concluded that the proposed Project would not impact or preclude any current or planned bicycle or transit facility.

Parking also was analyzed in the DNSP EIR. The EIR explained that parking was reviewed as a non-CEQA impact due to the California Court of Appeal ruling that parking is not part of the permanent physical environment, that parking conditions change over time as people change their travel patterns, and the unmet parking demand created by a project need not be considered a significant environmental impact under CEQA. The DNSP EIR anticipated future review of individual development projects facilitated under the DNSP would determine the adequacy of the proposed parking supply to meet the expected parking demand based on the parking requirements presented in the DNSP. Parking for the hotel would be located at the southeast corner of Randolph Street and

Second Street, across the street from the proposed hotel. The existing surface lot there would be converted to an automated parking structure that would serve the hotel needs and also contain parking spaces available to the public.

As explained below, the Project would not result in any new environmental effects relating to transportation and traffic that were not identified and addressed in the DNSP EIR.

a) When a signalized intersection operates at midrange LOS D (as allowed by the General Plan in most locations) or better under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS E or LOS F. The project mitigation should bring the facility to operate at midrange LOS D, at a minimum.

As discussed in the Traffic Report, the Project would result in 310 fewer trips than the uses assumed in the baseline DNSP EIR conditions. The Project would generate an estimated net total of 84 AM and 125 PM weekday peak hour trips. The baseline operations generated 157 AM and 221 PM weekday peak hour trips. As described in the Traffic Report, the Project results in a reduction in AM and PM peak hour trips. The Traffic Report shows that the DNSP with the Franklin Station Project generates 69 fewer trips in the AM peak for the Project site compared to the DNSP baseline assumptions. The Traffic Report shows that the DNSP with the Franklin Station Project generates 96 fewer trips in the PM peak for the Project site compared to the DNSP baseline assumptions. Because the Franklin Station Project is anticipated to generate fewer trips than assumed in the DNSP EIR, it would not result in any additional impacts from trip generation. Although some intersections operate deficiently with the implementation of the DNSP, the Project would result in overall long-term intersection levels of service that are consistent with, or better than with the approved DNSP.

The DNSP EIR identified significant long-term impacts at the Silverado Trail/Third Street/East Avenue/Coombsville Road and the SR 29 Northbound Ramp/First Street intersections. These were found to operate at deficient levels of service for existing conditions, and were found to be significantly impacted for short-term and long-term scenarios in the DNSP EIR. As discussed in the Traffic Report, the California Boulevard/First Street and California Boulevard/Second Street intersections were projected to operate deficiently by Year 2030 as a result of the full build out of the DNSP.

Under the Cumulative (2030) Impacts scenario, the Napa Transportation Management Plan Travel Demand Model was utilized to forecast future traffic volumes within the City of Napa. The 2030 scenario assumes full build out of the currently adopted City of Napa and Napa County General Plans. With and without the development proposed in the DNSP, the 2030 scenario shows two of the study intersections will operate at LOS F, SR 29 NB Off-Ramp/First Street and Silverado Trail/Third Street/East Avenue/Coombsville Road. For the Silverado Trial intersection, the City of Napa General Plan has identified future intersection improvements at this location; however, no designs have been approved.

Because of complexities involved with these traffic impacts and lack of ability to mitigate, these were found to be **significant and unavoidable impacts**. In Resolution R2012 54 the City Council of the City of Napa issued, pursuant to CEQA Guidelines Section 15093, a Statement of Overriding

Considerations. It identified specific economic, social and other considerations that render the unavoidable significant adverse environmental effects acceptable. The Statement of Overriding Considerations considered the traffic related impacts of the proposed DNSP, which were discussed in Section 4-L of the EIR. The EIR identified the mitigation measures to reduce the impact of DNSP related traffic at the affected intersections. Despite implementation of the identified mitigation, significant unavoidable impacts remain. The City determined that these impacts were outweighed by the benefits and jurisdictional limitations as set forth in the Statement of Overriding Considerations of the DNSP. Having considered the unavoidable adverse impacts of the DNSP, the City determined that all feasible mitigation has been adopted to reduce or avoid the potentially significant impacts identified in the EIR and that no additional feasible mitigation was available to further reduce significant impacts. The City also found that mitigation of traffic impacts related to DNSP traffic was hindered because implementation of mitigation measures was within the jurisdiction of another public agency. The City found that economic, social, and other considerations of the DNSP outweighed the unavoidable adverse traffic impacts. The City made a finding that it had balanced the benefits of the DNSP against its unavoidable environmental impacts and indicated its willingness to accept those impacts.

Consistent with the DNSP EIR Mitigation Monitoring and Reporting Program, the City of Napa maintains a Street Improvement Fee Program, which helps fund transportation improvements throughout the City. Every new development project within the City makes a fair share contribution to planned transportation improvements by means of this fee program, which manages the collection of fees and the implementation of improvements. Through this system, capacity improvements occur in an orderly and systematic manner, with all future development contributing on an equitable basis. For example, the City of Napa is implementing the California Boulevard/First Street and California Boulevard/Second Street roundabouts project that would mitigate impacts at the SR 29 Northbound Ramps/First Street intersection through 2025, but further improvements may be needed to address long-term impacts. A portion of the street improvement fees would be used to pay for a proportionate share of a project's impacts.

Franklin Station would be required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to cumulative impacts to City intersections. With the payment of the street improvement fee, and subsequent City-wide transportation improvements made with the funds from the street improvement fees, and because Franklin Station adds fewer Project trips than expected in the DNSP EIR, the Project would not significantly degrade any signalized intersection operating at midrange LOS D or better under DNSP baseline conditions.

b) When a signalized intersection operates at midrange LOS E (as allowed by the General Plan in some locations and for State highway facilities) or better under existing or interim baseline conditions, the addition of project trips degrades the intersection operations to LOS F. The project mitigation should bring the facility to operate at midrange LOS E, at a minimum.

Please refer to the discussion set forth in Transportation and Traffic Impact-a), above, and the analysis of the Statement of Overriding Considerations discussed therein is adopted herein by reference.

The Project would be required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to cumulative impacts to City intersections. With the payment of the street improvement fee, and subsequent City-wide transportation improvements made with the funds from the street improvement fees, and because the Project adds fewer trips than expected in the DNSP EIR, it would not degrade any signalized intersections operating at LOS E or better to LOS F.

c) When a signalized intersection operates at LOS F (a violation of the General Plan LOS policy) under existing or interim baseline conditions, the addition of more than 50 peak-hour project trips contributes to the continuing operational failure at the intersection. The project mitigation should bring the facility to pre-project conditions.

Please refer to the discussion set forth in Transportation and Traffic Impact-a) above, and the analysis of the Statement of Overriding Considerations discussed therein is adopted herein by reference.

The Project would generate an estimated net total of 73 AM and 83 PM weekday peak hour trips. The Traffic Report shows that the DNSP with the Franklin Station Project generates 29 fewer trips in the AM peak for the Project site compared to the DNSP assumptions without Franklin Station. The Traffic Report shows that the DNSP with the Franklin Station Project generates 77 fewer trips in the PM peak for the Project site compared to the DNSP assumptions without Franklin Station. Therefore, Franklin Station generates only a net of 44 AM peak hour trips and 6 net PM peak trips compared to the assumptions for the site under the EIR.

Franklin Station would be required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to cumulative impacts to City intersections. With the payment of the street improvement fee, and subsequent City-wide transportation improvements made with the funds from the street improvement fees, and because the Project adds fewer trips than expected in the DNSP EIR, it would not significantly degrade any signalized intersection that currently operates at LOS F.

d) At an unsignalized intersection when the minor stop-controlled approach operates at LOS E or better or has acceptable operation in terms of total control delay, the addition of project trips increases the total control delay to more than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multilane approach. The project mitigation should bring the facility to operate at LOS E or to bring the total control delay to less than 4.0 vehicle-hours for a single lane approach or 5.0 vehicle-hours for a multilane approach, at a minimum.

As described in the DNSP EIR, the unsignalized intersection of SR 29 Northbound Off-ramp/First Street operates at LOS F. For this intersection to operate at an acceptable level of service, the intersection should be signalized. With full DNSP buildout, this intersection would operate at a LOS B or better if signalized.

Please refer to the discussion set forth in Transportation and Traffic, a, above, and the analysis of the Statement of Overriding Considerations discussed therein is adopted herein by reference.

Franklin Station would be required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to cumulative impacts to City intersections. With the payment of the street improvement fee, and subsequent City-wide transportation improvements made with the funds from the street improvement fees, and because the Project adds fewer trips than expected in the DNSP EIR, it would not significantly degrade any unsignalized intersections operating at LOS E or better.

e) At an unsignalized intersection when the minor stop-controlled approach operates at LOS F and does not have acceptable operation in terms of total control delay the addition of more than 50 peak-hour project trips contributes to the continuing operational failure at the minor approach. The project mitigation should bring the facility to pre-project conditions.

Please refer to the discussion set forth in Transportation and Traffic, a, above, and the analysis of the Statement of Overriding Considerations discussed therein is adopted herein by reference.

As described in the DNSP EIR, the unsignalized intersection of SR 29 Northbound Off-ramp/First Street operates at LOS F. For this intersection to operate at an acceptable level of service, the intersection should be signalized. With full DNSP buildout, this intersection would operate at a LOS B or better if signalized.

Franklin Station would be required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to cumulative impacts to City intersections. With the payment of the street improvement fee, and subsequent City-wide transportation improvements made with the funds from the street improvement fees, and because the Project adds fewer trips than expected in the DNSP EIR, it would not significantly degrade any unsignalized intersections operating at LOS F.

f) If the proposed project is on a Crucial Corridor and the property is zoned Traffic Impact Overlay (TI), the project generates more than 520 trips/gross acre/day (or gross floor area equivalent). Uses with higher trip generation characteristics are prohibited unless:

i. Adjustments in the gross floor area, gross acreage, operation, etc., are made to reduce the number of trips to an acceptable level as determined by the Public Works Director, or

ii. The Public Works Director finds that the transportation benefits of the project clearly outweigh the adverse effect on the crucial corridor. Transportation benefits of the project may include roadway and safety improvements, traffic system management strategies, transit service enhancements, travel demand management strategies, among others.

The Project is not located on a Crucial Corridor and the property is not zoned Traffic Impact Overlay (TI). Therefore, this section is not applicable.

Mitigating Policies and Implementing Programs

The Project is required to pay the City's street improvement fee, which would represent mitigation for the Project's contribution to impacts to City intersections.

As described above, the City Council of the City of Napa issued, pursuant to CEQA Guidelines Section 15093, a Statement of Overriding Considerations, which identified specific economic social and other considerations that render the unavoidable significant adverse environmental effects acceptable. Having considered the unavoidable adverse impacts of the Specific Plan Project, the City determined that all feasible mitigation has been adopted to reduce or avoid the potentially significant impacts identified in the EIR and that no additional feasible mitigation was available to further reduce significant impacts. The City also found that mitigation of traffic impacts related to Project traffic was hindered because implementation of mitigation measures was within the jurisdiction of another public agency. The City found that economic, social, and other considerations of the Specific Plan Project outweighed the unavoidable adverse traffic impacts.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant transportation and traffic impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant transportation and traffic impact.
4. There is no new information of substantial importance showing that significant transportation and traffic impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

Environmental Issue Area	Potentially Significant Impact, Unmitigated	Potentially Significant Impact, Mitigated	Less Than Significant Impact	No Impact
17. Utilities and Service Systems *Would the project:*				
a. Result in substantial adverse physical effects associated with the provision of new or physically altered police, fire, or school facilities, or the need for new or physically altered facilities; the construction of which could cause significant environmental impacts in order to maintain acceptable levels of service ratios, response times, or other performance objectives for any of the following services: - fire and police protection; - schools; - other public facilities	☐	☐	☐	☒
b. Have insufficient water supplies available to serve the project from existing entitlements.	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	☐	☐	☐	☒
d. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	☐	☐	☐	☒
e. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.	☐	☐	☐	☒
f. Not comply with federal, State, and local statutes and regulations related to solid waste.	☐	☐	☐	☒

The Project was examined and compared to the analysis in the DNSP EIR as it pertains to utilities and service systems and, as detailed below, it was determined that the Project is within the scope of the DNSP development program and would not result in any new significant environmental effects relating to utilities and service systems.

a) The Project would not result in substantial adverse physical effects associated with the provision of new or physically altered police, fire, or school facilities, or the need for new or physically altered facilities; the construction of which could cause significant environmental impacts in order to maintain acceptable levels of service ratios, response times, or other performance objectives for any of the following services:

- **fire and police protection;**
- **schools;**
- **other public facilities.**

The EIR concluded that development facilitated by the DNSP would result in an increased demand for police and protection services in Downtown Napa. New development could increase the number of calls for service received in Downtown and the level of regulatory oversight necessary to serve the increased population and employment. The buildout envisioned by the DNSP may require additional police and fire department staff to maintain response times and/or the construction or expansion of facilities. The increased demand for police and fire protection services would be gradual and incremental over the DNSP 20-year timeframe. City review of individual development projects, which would include both fire and police department review, would reduce the potential for service deficiencies related to the DNSP. Also, the promotion of more mixed uses by the DNSP, including ground-level retail and improvements to the pedestrian infrastructure, as well as the increased residential population would assist in the deterrence crime by adding "eyes on the street." Implementation of the DNSP is not anticipated to result in the need for new or expanded police protection facilities. Therefore, the EIR concluded the impact would be less than significant. The Project has been reviewed by the City's police department. The Project would include ground level retail, which the EIR concluded would increase "eyes on the street" to reduce crime.

A key component of fire protection services is the capacity of the water system to provide sufficient flow for firefighting purposes. The EIR found that existing water distribution system in Downtown was not designed to meet current fire flow requirements. In general, current standards require Downtown water mains to be sized between 8- and 12-inches in order to meet fire flow demands of existing and anticipated development. System connectivity must also be considered to avoid stagnant water issues while providing sufficient fire flows. The existing Downtown system primarily consists of 6-inch cast iron pipe with some 4-inch pipes. Due to the age and small size of the typical Downtown water mains, the existing distribution system needs to be upgraded and replaced. Approximately 50 percent of existing water pipes will require upgrades as a result of buildout of the DNSP. Water distribution system upgrades necessary to provide adequate fire protection services in Downtown would be provided by a combination of funding sources, both private and public. Development facilitated by the DNSP would be subject to General Plan policies regarding the provision of public facilities. Implementation of the DNSP is not anticipated to result in the need for new or expanded fire protection facilities. Therefore, the EIR concluded that the impact would be less than significant.

The Project proposes only accessory residential occupancy and does not include traditional residential development and so it is not expected to result in new students. The Project would pay school impact fees. The Project could increase the number of residents within Downtown, with new

employees. New employees could increase student enrollment at local schools. The Project is required to pay school impact fees established to offset potential impacts from new development on school facilities. Local jurisdictions are precluded under State law (SB 50) from imposing school enrollment-related mitigation beyond the school development fees. The collection of these fees, therefore, is considered under SB 50 to fully mitigate any potential effects associated with additional development that could result from the Project.

Costs associated with the DNSP include improvements needed to assure that proposed development has the infrastructure and service capacity consistent with citywide standards and policies. Chapter 8 (Implementation) of the DNSP describes some of the possible sources of funding for public improvements in Downtown Napa. The EIR described that funding is anticipated to be provided from a variety of mechanisms and sources, including the following: developer-funded improvements and public-private negotiated improvements; existing development impact fee programs; Capital Improvement Program; impact fees imposed by other agencies such as the NSD and school district; water and sewer rate increases; and General Fund transfers. In addition, new funding sources could include the following: DNSP Area Development Impact Fee adopted in accordance with the State's Mitigation Fee Act (Government Code Section 66000 et. seq.); Mello-Roos Community Facilities District (CFD); and development agreements, dedications, or exactions. New development facilitated by the DNSP would be required to pay its fair share of system improvements as required by General Plan policies. The EIR concluded that developer-driven fees and payments in combination with other existing and proposed sources of funding for water system improvements would reduce potential impacts to a less than significant level with no additional mitigation required.

Because the Project would be required to pay all applicable impact fees for public facilities and with the ground level retail and detailed fire and police department reviews and conditions of approval, the Project would not result in substantial adverse physical effects associated with the provision of new or physically altered police, fire, or school facilities, or the need for new or physically altered facilities; the construction of which could cause significant environmental impacts in order to maintain acceptable levels of service ratios, response times, or other performance objectives public facilities and services.

b) The City would have sufficient water supplies available to serve the project from existing entitlements.

The EIR analyzed whether the City would have sufficient water supplies to serve development facilitated by the DNSP from its existing entitlements. An update to the City's Urban Water Management Plan (UWMP) was adopted by the City in 2011 and updated in 2017. The UWMP describes and evaluates the City's sources of water supply, projected population, future water demand, as well as strategies for responding to water shortages. This update to the UWMP was based in part on data collected in conjunction with the 2050 Napa Valley Water Resources Study, of which the City was a participant. Information regarding the City's water supply, demand, and reliability are incorporated into both documents. The UWMP analyzed the reliability of the City's water service by comparing supply and demand for future normal, single-dry, and multiple-dry year scenarios through 2035. Surpluses ranging from 52 percent to 55 percent are projected in normal years through 2035. The City would experience water shortages in single-dry years through 2025

ranging from 2 percent to 6 percent. However, many of the assumptions used in the analysis were conservative for planning purposes.

Although California experienced drought years, through 2016. Notwithstanding the drought years, the City of Napa's existing water supply remains adequate for normal demand through 2035. Additionally, the completed construction of a recycled water pipeline under the Napa River will reduce potable water demand as vineyards transition from City water to recycled water. The EIR found that developer-driven fees and payments in combination with other existing and proposed sources of funding for water system improvements would reduce potential impacts regarding water supply and distribution to a less than significant level and no mitigation was required.

Because the City has sufficient water supply to meet its anticipated demands through the year 2035, and because the Project is required to pay its fair share of water system improvements, it would have sufficient water supplies available to serve the Project from its existing entitlements.

c) The Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

The EIR analyzed whether development facilitated by the DNSP could potentially result in wastewater service demands that would result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve projected demand or result in the construction of new or expanded wastewater treatment facilities. Development facilitated by the DNSP would increase the amount of wastewater generated within Downtown, potentially affecting the capacity of the wastewater treatment plant (WWTP) operated by the Napa Sanitation District (NSD). The EIR found that developer-driven fees and payments in combination with other existing and proposed sources of funding for wastewater treatment improvements would reduce potential impacts regarding water supply and distribution to a less than significant level and no mitigation was required.

The Project would be required to connect to the NSD for sewer service. The NSD would impose capacity charges and any necessary on-site or off-site improvements needed to serve the Project. The Project also would be subject to ongoing sewer service charges imposed by the NSD. NSD has reviewed the Project and has agreed it has the capacity to serve it.

d) The Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The EIR explained that NSD has prepared a WWTP Master Plan for the Soscol Water Recycling Facility (NSD, 2011) that analyzes the existing capacity of the WWTP; describes the future capacity increases and treatment process upgrades needed to accommodate growth within the service area; and complies with anticipated changes in future regulatory requirements. The plan is expected to provide a roadmap for operational and capital improvements through 2030. The draft plan was presented to the NSD Board of Directors in early 2011 and was approved in April 2011. Construction of the upgrades identified by the Master Plan will allow the treatment plant to fully serve the level of

growth anticipated in the NSD service area through 2030. The EIR discussed that although the Master Plan does not include growth anticipated by buildout of the DNSP, it does include a sensitivity analysis to indicate how capacity of the WWTP could be affected by a growth rate faster than that in the base projected development rate. If approximately 150 more equivalent dwelling units (EDUs) were constructed each year than under the base case analysis, the WWTP would reach capacity in about 2026 as compared to 2030. The EIR concluded that development facilitated by the DNSP may require investment in new or upgraded sanitary sewer infrastructure. The NSD collection system has adequate dry-weather capacity to support the level of growth anticipated by the City's General Plan, but has inadequate capacity to accommodate existing wet-weather peak flows caused by high infiltration and inflow in many areas of the City, including the Downtown area. Development facilitated by the DNSP would be subject to the General Plan policies regarding the provision of wastewater treatment facilities.

The Project would be required to connect to the NSD for sewer service. The NSD would impose capacity charges and any necessary on-site or off-site improvements needed to serve the Project. The Project also would be subject to ongoing sewer service charges imposed by the NSD. NSD has reviewed the Project and has confirmed that it has the capacity to serve the Project with its existing facilities. Consequently, the Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

e) The Project would not be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

The EIR analyzed whether development facilitated by the DNSP could potentially be served by a landfill with insufficient permitted capacity to accommodate solid waste generated by the Project, and would comply with federal, State, and local statutes and regulations related to solid waste. Population and commercial growth in Downtown would generate increased amounts of solid waste. This increase would be gradual and incremental over the 20-year time frame of the DNSP. Although the increased residential population and business activities resulting from implementation of the DNSP would incrementally increase the total waste generated by the City, the increasing rate of diversion through recycling, composting, and other methods would result in a decreasing share of total waste that would be disposed in landfills serving the City. Projects facilitated by the DNSP would also generate construction/demolition debris. Projects would be required to comply with the City's construction and demolition debris ordinance (Chapter 15.32) requiring diversion of 50 percent of such waste from landfill disposal. The EIR concluded given these facts, and given the long-term capacity available at Keller Canyon Landfill through 2030, the DNSP would not result in landfills exceeding permitted capacities.

Because the Project is within the level of development anticipated to be facilitated by the DNSP and because the landfill has permitted capacity to accommodate the development facilitated by the DNSP, the Project would not be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs.

f) The Project would not cause the City to violate federal, State, or local statutes or regulations related to solid waste.

The EIR found that population and commercial growth from development facilitated by the DNSP would generate increased amounts of solid waste. This increase would be gradual and incremental over the 20-year time frame of the Specific Plan. The EIR concluded that implementation of the Specific Plan would not impede the ability of the City to meet waste diversion requirements or cause the City to violate other applicable federal, State, and local statutes and regulations related to solid waste. Therefore, the EIR concluded that impacts regarding landfill capacity and compliance with solid waste regulations would be less than significance.

Because the Project is within the development anticipated to be facilitated by the DNSP, it would not impede the ability of the City to meet waste diversion requirements or cause the City to violate other applicable federal, State, and local statutes and regulations related to solid waste.

General Plan and DNSP Mitigating Policies and Implementing Programs

Payments of all applicable impact fees. No other Mitigation is required.

Conclusions

1. The proposed Project is within the scope of the DNSP development program evaluated in the DNSP EIR.
2. The proposed Project would not result in new significant utilities and service systems impacts that were not evaluated in the DNSP EIR.
3. The proposed Project would not result in an increase in the severity of a previously identified significant utilities and service systems impact.
4. There is no new information of substantial importance showing that significant utilities and service systems impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

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SECTION 5: MITIGATION MONITORING AND REPORTING PROGRAMS

This section includes the Mitigation Monitoring and Reporting Program (MMRP) from the DNSP EIR. The MMRP lists the mitigation measures, implementation procedures, monitoring responsibility, monitoring and reporting action, monitoring schedule and verification of compliance. It is included to identify the specific mitigation measures identified and required under Section 4 for the Franklin Station Project.

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SECTION 6: PERSONS AND ORGANIZATIONS CONSULTED/LIST OF PREPARERS/REFERENCES

6.1 - Persons and Organizations Consulted

6.1.1 - Lead Agency

City of Napa

Planning Manager..... Erin Morris

6.2 - List of Preparers

6.2.1 - Lead Consultant

FirstCarbon Solutions

Project Director .....Jason Brandman
Project Manager .....Grant Gruber

6.2.2 - Technical Subconsultants

Historic Consultant

Preservation Architecture

Historic Consultant ..... Mark Hulbert

Traffic and Parking Consultant

Kimley-Horn and Associates, Inc.

Traffic Engineer.....Mychal Loomis, P.E.

6.2.3 - Applicant Team

Owner

Principal..... James Keller

Land Use Planner and Engineering

KGPartners

Lead Partner ..... Scott Klingbeil

Land Use Counsel

Holman Teague Roche Anglin, LLP

Lead Partner ..... Kevin Teague

Architect

NDP

Principal .....Steve Cuddy

6.3 - References and Documents

City of Napa. 2018. Napa Municipal Code.

City of Napa. 1998. Envision Napa 2010. General Plan.

City of Napa. 2012. Downtown Specific Plan EIR (SCH No. 2010042043)

City of Napa. 2012. Downtown Specific Plan Appendix G.

Hulbert, Mark. 2018. Historic Resource Summary and Project Evaluation.

Kimley-Horn and Associates, Inc. 2018. Traffic Analysis for Franklin Station Napa Hotel Project.