



Franklin Station Project  
**Addendum to the  
DNSP Environmental Impact Report  
(State Clearinghouse No. 2010042043)**

*City of Napa, Napa County, California*

---

**PREPARED FOR:**

**City of Napa  
Planning Division**

1600 First Street  
Napa, CA 94559  
707.257.9530

**PREPARED BY:**

**FirstCarbon Solutions**

2999 Oak Road, Suite 250  
Walnut Creek, CA 94597  
925.357.2562

Contact: Jason Brandman, Project Director  
Angela Wolfe, Senior Project Manager

June 24, 2026

**THIS PAGE INTENTIONALLY LEFT BLANK**

# Table of Contents

|                                                      |           |
|------------------------------------------------------|-----------|
| <b>Acronyms and Abbreviations</b>                    | <b>v</b>  |
| <b>1 - Introduction</b>                              | <b>1</b>  |
| 1.1 - Overview                                       | 1         |
| 1.2 - Agency Role                                    | 4         |
| 1.3 - Purpose and Background                         | 4         |
| 1.4 - Background Discussion                          | 9         |
| 1.5 - Summary of Results                             | 12        |
| 1.6 - Format of Addendum                             | 12        |
| <b>2 - Project Description</b>                       | <b>15</b> |
| 2.1 - Project Background                             | 15        |
| 2.2 - Location and Setting                           | 24        |
| 2.3 - Environmental Setting                          | 27        |
| 2.4 - Project Characteristics                        | 31        |
| 2.5 - Discretionary Approvals                        | 50        |
| <b>3 - CEQA Checklist</b>                            | <b>51</b> |
| 3.1 - Explanation of Checklist Evaluation Categories | 51        |
| 3.2 - Discussion and Mitigation Sections             | 52        |
| 3.3 - Environmental Topics                           | 53        |
| I. Aesthetics, Light, and Glare                      | 55        |
| II. Agriculture and Forestry Resources               | 63        |
| III. Air Quality                                     | 67        |
| IV. Biological Resources                             | 83        |
| V. Cultural and Tribal Cultural Resources            | 94        |
| VI. Energy                                           | 106       |
| VII. Geology, Seismicity, and Soils                  | 112       |
| VIII. Greenhouse Gas Emissions                       | 124       |
| IX. Hazards and Hazardous Materials                  | 133       |
| X. Hydrology and Water Quality                       | 143       |
| XI. Land Use and Planning                            | 153       |
| XII. Mineral Resources                               | 156       |
| XIII. Noise                                          | 158       |
| XIV. Population and Housing                          | 165       |
| XV. Public Services                                  | 169       |
| XVI. Recreation                                      | 176       |
| XVII. Transportation                                 | 179       |

|                                                                  |            |
|------------------------------------------------------------------|------------|
| XVIII. Utilities and Service Systems                             | 187        |
| XIX. Wildfire                                                    | 195        |
| XX. Mandatory Findings of Significance                           | 200        |
| <b>4 - Conclusions</b>                                           | <b>205</b> |
| 4.1 - Section 15183 Exemption for General Plan Consistency       | 205        |
| 4.2 - Infill Development Project, Class 32 Categorical Exemption | 206        |

## **Appendix A: Certificate of Appropriateness**

## **Appendix B: Planned Development 37 Overlay Amendments**

## **Appendix C: Franklin Station Hotel Design Guidelines**

## **Appendix D: Air Quality Supporting Information**

## **Appendix E: Biological Resources Supporting Information**

## **Appendix F: Cultural Resources and Tribal Cultural Resources Supporting Information**

## **Appendix G: Transportation Supporting Information**

## **Tables**

|                                                                   |     |
|-------------------------------------------------------------------|-----|
| Table 1: Proposed Project Parcels                                 | 2   |
| Table 2: Summary of Proposed Changes                              | 37  |
| Table 3: PD-37 Overlay Development Standards Comparison           | 38  |
| Table 4: Bay Area 2017 Clean Air Plan Applicable Control Measures | 69  |
| Table 5: Cumulative Health Risks at the Project Site              | 77  |
| Table 6: Bay Area Air District Thresholds for Land Use Projects   | 125 |

## **Exhibits**

|                                                                         |    |
|-------------------------------------------------------------------------|----|
| Exhibit 1: Downtown Napa Specific Plan Planning Area                    | 17 |
| Exhibit 2: Building Form Zones                                          | 19 |
| Exhibit 3: Existing Conditions                                          | 25 |
| Exhibit 4: Downtown Napa Specific Plan Land Use Designations and Zoning | 29 |
| Exhibit 5: Site Plan Layout                                             | 33 |
| Exhibit 6: Illustrative Site Plan                                       | 35 |
| Exhibit 7: Proposed Massing                                             | 43 |
| Exhibit 8: Significant Historical Features                              | 45 |
| Exhibit 9: Design Features                                              | 47 |



## ACRONYMS AND ABBREVIATIONS

|                       |                                                       |
|-----------------------|-------------------------------------------------------|
| °C                    | degrees Celsius (Centigrade)                          |
| °F                    | degrees Fahrenheit                                    |
| µg/m <sup>3</sup>     | micrograms per cubic meter                            |
| AB                    | Assembly Bill                                         |
| ABAG                  | Association of Bay Area Governments                   |
| ADA                   | Americans with Disabilities Act                       |
| APN                   | Assessor's Parcel Number                              |
| ARB                   | California Air Resources Board                        |
| ATCM                  | Airborne Toxic Control Measure                        |
| Bay Area Air District | Bay Area Air Quality Management District              |
| BERD                  | Built Environment Resources Directory                 |
| BMP                   | Best Management Practice                              |
| C&D                   | construction and demolition                           |
| CalEEMod              | California Emissions Estimator Model                  |
| Cal/EPA               | California Environmental Protection Agency            |
| CAL FIRE              | California Department of Forestry and Fire Protection |
| CALGreen              | California Green Building Standards Code              |
| Caltrans              | California Department of Transportation               |
| CBC                   | California Building Standards Code                    |
| CCR                   | Code of Regulations                                   |
| CDFW                  | California Department of Fish and Wildlife            |
| CEQA                  | California Environmental Quality Act                  |
| CGS                   | California Geological Survey                          |
| CO <sub>2</sub>       | carbon dioxide                                        |
| CRHR                  | California Register of Historical Resources           |
| DMA                   | drainage management area                              |
| DMU                   | Downtown Mixed Use                                    |
| DNBP                  | Downtown Napa Specific Plan                           |
| DP                    | Downtown Public                                       |
| DPM                   | diesel particulate matter                             |
| DTSC                  | California Department of Toxic Substances Control     |
| EIR                   | Environmental Impact Report                           |
| EMFAC2025             | EMission FACtors mobile source emissions model        |

|         |                                                 |
|---------|-------------------------------------------------|
| EV      | electric vehicle                                |
| FAR     | floor area ratio                                |
| FCS     | FirstCarbon Solutions                           |
| FEMA    | Federal Emergency Management Agency             |
| FHSZ    | Fire Hazard Severity Zones                      |
| FIRM    | Flood Insurance Rate Map                        |
| FTA     | Federal Transit Administration                  |
| GHG     | greenhouse gas                                  |
| HCP     | Habitat Conservation Plan                       |
| HDM     | Highway Design Manual                           |
| HRA     | Health Risk Assessment                          |
| HV      | central heating and ventilation                 |
| HVAC    | heating, ventilation and air conditioning       |
| IBC     | International Business Code                     |
| IM      | Implementation Measure                          |
| LEED®   | Leadership in Energy and Environmental Design   |
| LOS     | Level of Service                                |
| LUST    | Leaking Underground Storage Tank                |
| MCE     | Marin Clean Energy                              |
| MERV-13 | Minimum Efficiency Reporting Values             |
| MLD     | Most Likely Descendant                          |
| MM      | Mitigation Measure                              |
| MMRP    | Mitigation Monitoring and Reporting Program     |
| mph     | miles per hour                                  |
| NAHC    | Native American Heritage Commission             |
| NapaSan | Napa Sanitation District                        |
| NCCP    | Natural Community Conservation Plan             |
| NCL     | Napa County Landmarks                           |
| ND      | negative declaration                            |
| NFD     | Napa Fire Department                            |
| NOI     | Notice of Intent                                |
| NPD     | Napa Police Department                          |
| NPDES   | National Pollutant Discharge Elimination System |
| NRHP    | National Register of Historic Places            |
| NRWS    | Napa Recycling and Waste Services               |
| NVTA    | Napa Valley Transportation Authority            |

---

|                   |                                                |
|-------------------|------------------------------------------------|
| NVUSD             | Napa Valley Unified School District            |
| NWIC              | Northwest Information Center                   |
| OHP               | California Office of Historic Preservation     |
| PD                | Planned Development                            |
| PG&E              | Pacific Gas and Electric Company               |
| PRC               | Public Resources Code                          |
| RPS               | Renewable Portfolio Standard                   |
| RWQCB             | Regional Water Quality Control Board           |
| SB                | Senate Bill                                    |
| SCH               | State Clearinghouse                            |
| SLF               | Sacred Lands File                              |
| SR                | State Route                                    |
| SRA               | State Responsibility Area                      |
| State Water Board | California State Water Resources Control Board |
| SVP               | Society of Vertebrate Paleontology             |
| SWPPP             | Storm Water Pollution Prevention Plan          |
| TAC               | toxic air contaminant                          |
| T-BACT            | Toxics Best Available Control Technology       |
| TCM               | Transportation Control Measure                 |
| TCR               | Tribal Cultural Resource                       |
| TDM               | Transportation Demand Management               |
| USFWS             | United States Fish and Wildlife Service        |
| USGS              | United States Geological Survey                |
| USPS              | United States Postal Service                   |
| VMT               | Vehicle Miles Traveled                         |
| VOC               | volatile organic compounds                     |
| WEAP              | Workers Environmental Awareness Program        |

**THIS PAGE INTENTIONALLY LEFT BLANK**

## Franklin Station Project

## Addendum

# 1 - INTRODUCTION

## 1.1 - Overview

This Addendum is being prepared for the proposed Franklin Station Project (project or proposed project), which is located within the City of Napa's (City's) Downtown Napa Specific Plan (DNSP or "Specific Plan") boundaries. As described in more detail in Section 2, the proposed project includes minor changes to the development program adopted in the DNSP and evaluated in the certified DNSP Environmental Impact Report (DNSP EIR) (State Clearinghouse [SCH] No. 2010042043) and modified by the Franklin Post Office Project Addendum (SCH No. 2010042043). The proposed City actions to develop the project include amendments to the Planned Development (PD) 37 Overlay, approval of a Certificate of Appropriateness, a new Development Agreement, approval of a Tentative Parcel Map, and Major Design Review.

If approved, the proposed project would permit the restoration and redevelopment of the Franklin Station Post Office building to construct a 5-story (approximately 75 feet in height with rooftop features) hotel with up to 120 rooms and related amenities (the "hotel development area"), as well as the development of a 5-story (approximately 75 feet in height with rooftop features) mixed-use structure containing up to 37 for-sale hotel units, which would adjoin an existing adjacent residential structure with three residential units for a total of up to 40 for-sale hotel units, as well as accessory uses and a small ground-floor commercial area on a separate collection of parcels (collectively, the "mixed-use development area").

The proposed project includes two separate development areas: the hotel development area and the mixed-use development area.

The hotel development area includes up to 5,400 square feet of common area (including lobby, lounge areas and restroom areas), 6,220 square feet of spa uses, 6,390 square feet for fitness uses (including a rooftop pool), 10,340 square feet of meeting/banquet space, 8,670 square feet for food and beverage uses (including a lobby bar/lounge, rooftop bar, and ground floor restaurant) and 43,870 square feet for back-of-house support and service areas (including office administration, food service/kitchen, security, maintenance, and mechanical systems).

The mixed-use development area includes up to 11,170 square feet of common area (including lobby, lounge, courtyard, and roof deck), 1,000 square feet of fitness area, and 1,180 square feet for ground floor commercial (a café with outdoor space), 13,090 square feet for support and service area (including office administration, food service/kitchen, security, and mechanical systems), and 14,940 square feet of ground level parking.

The new Development Agreement would allow the project to reduce the number of hotel rooms and for-sale hotel units, as well as modify the respective development areas within the hotel development area and mixed-use development area without increasing the total square footage of the proposed

project. Notwithstanding a developer's ability to decrease the intensity of the proposed project, the environmental analysis presented in this Addendum conservatively assumes a "maximum development" scenario. Any developer modifications facilitated under the Development Agreement would primarily affect the interior portions of each building without substantially changing the exterior areas. As a result, this Addendum also assumes the general building exterior design (e.g., form, massing, height, etc.) of the proposed project would not change.

The proposed project would be developed on 13 existing parcels totaling approximately 1.44 acres. The western portion of the project site, which comprises of the hotel development area, contains the Franklin Station Post Office building located at 1351 Second Street in the City of Napa, in Napa County (County), California, designated as Assessor's Parcel Number (APN): 003-208-001 (Post Office Parcel). The eastern portion of the project site, which comprises the mixed-use development area, consists of a 0.47-acre parking lot and the US Post Office Wine Valley Box Unit building on the southeast corner of Second Street and Randolph Street, as well as the second floor of the existing structure located at the corner of Randolph Street, and Coombs Street, commonly known as the Young Building. The eastern portion of the site corresponds to APNs: 003-212-001 (Parking Lot Parcel), 003-300-014 (Wine Valley Box Unit Parcel), and 003-300-015, -016 -017, -018, -019, -020, -021, -022, -023, and -024 (collectively, the Young Building Parcel). The Post Office Parcel, Parking Lot Parcel, Wine Valley Box Unit Parcel, and Young Building Parcel are referred to herein collectively as the "project site." Unless specifically stated, this analysis evaluates the entire project site.

The Young Building Parcel contains APNs that correspond to individual condominium units within the building. APNs 003-300-022, 003-300-023, and 003-300-024 correspond to existing condominium units on the second floor of the Young Building to be redeveloped. All other APNs belonging to the Young Building (003-300-015, -016 -017, -018, -020, -021, -022, -023, and -024) would not include any redevelopment.

Table 1 provides a detailed breakdown of each parcel and its acreage.

**Table 1: Proposed Project Parcels**

| APN(s)                                                                                                                                                                                                                              | Name                        | Acreage     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------|
| 003-208-001                                                                                                                                                                                                                         | Post Office Parcel          | 0.66        |
| 003-212-001                                                                                                                                                                                                                         | Parking Lot Parcel          | 0.47        |
| 003-300-014                                                                                                                                                                                                                         | Wine Valley Box Unit Parcel | 0.06        |
| 003-300-015, -016 -017, -018, -019, -020, -021, -022, -023, and -024                                                                                                                                                                | Young Building Parcel       | 0.25        |
| <b>Total Acreage</b>                                                                                                                                                                                                                |                             | <b>1.44</b> |
| Notes:<br>APN = Assessor's Parcel Number<br>APNs 003-300-022, 003-300-023, and 003-300-024 correspond to existing condominium units on the second floor of the Young Building to be redeveloped.<br>Source: 1351 Second Street LLC. |                             |             |

The proposed project is fully described in Section 2 of this Addendum.

This Addendum and attached supporting documents have been prepared to determine whether and to what extent the proposed project is within the scope of the DNSP EIR prepared for the City of Napa (certified by the Napa City Council in Resolution R2012 54, adopted on May 1, 2012, and modified by the 2018 Addendum that was approved on November 13, 2018). The DNSP program was reinforced through the City Council's certification of the City of Napa General Plan Update 2040 Final Environmental Impact Report (General Plan EIR, SCH# 2021010255) in October 2022, which acknowledged the DNSP EIR (SCH #2010042043) and the goals of the Specific Plan, including the land uses and development potential programmed for the Specific Plan buildout.<sup>1</sup>

An earlier iteration of the project was originally approved on November 13, 2018, to include certain amendments to the General Plan, Specific Plan, and zoning regulations, along with a Development Agreement, a Certificate of Appropriateness,<sup>2</sup> and a Planned Development Overlay. The 2018 approvals allowed construction of a 163-room luxury hotel with restaurant, retail, bar, and related amenities; a parking structure up to 60 feet tall; and up to 7,000 square feet of ground-floor retail space. The modifications were evaluated in an Addendum (2018 Addendum) and found to be within the scope of the DNSP EIR.

Subsequent to the approval of the 2018 Addendum, the applicant now proposes modifications to the project, and this Addendum evaluates whether there are project-specific significant effects associated with these modifications and whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000, *et seq.*) or its implementing regulations (Title 14, Division 6, Chapter 3 of the California Code of Regulations [CEQA Guidelines] § 15000, *et seq.*).

### 1.1.1 - CEQA Approach

It is the policy of the State of California that environmental review under CEQA be completed efficiently and expeditiously so that the limited resources of State and local agencies can be devoted to environmental mitigation rather than duplicative administrative processes (PRC § 21003(f)). To that end, CEQA contains streamlining provisions intended to reduce duplication and promote efficiency in the environmental review process. (See, e.g., PRC §§ 21083.3, 21156; CEQA Guidelines § 15168.)

As explained above, the proposed project is within the boundaries of the DNSP, and the City's implementation of the DNSP was subject to environmental review in the certified DNSP EIR. The DNSP EIR was a "program" EIR prepared pursuant to CEQA Guidelines Section 15168, and it anticipated and evaluated development of the project site as part of the overall development of the Downtown area. As a result, under Section 15168(c), the proposed project "must be examined in light

---

<sup>1</sup> City of Napa. 2012. Downtown Napa Specific Plan Program Environmental Impact Report (DNSP EIR). March.

<sup>2</sup> Resolution R2018-134 approved the Certificate of Appropriateness for the prior approved project, per City Municipal Code Section 15.52.070(C), authorizing revised Downtown Napa Historic Resources Design Guidelines and the performance of work for the Franklin Station Post Office Building.

of the program EIR to determine whether an additional environmental document must be prepared.” Additionally, Section 15164 mandates that, “[t]he lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.” To perform the required examination, the City utilized this comprehensive Addendum, evaluating all of the potential environmental effects from the proposed project to determine whether it would have any effects that were not identified and adequately addressed in the DNSP EIR. The City’s process for complying with Section 15168 is described in greater detail in Section 1.3.1 below.

Based on the analyses and conclusions in this Addendum, the City has determined that the proposed project is within the scope of the DNSP EIR and that none of the conditions requiring a subsequent EIR are present. Accordingly, this Addendum to the DNSP EIR constitutes full compliance with CEQA’s environmental review requirements because, among other things, environmental impacts from development of the project site were fully evaluated in the DNSP Final EIR; the project site is located within the Building Form Zone II, which addressed development within the Planning Area through 2035 and established policies, programs, and guidelines set forth in the DNSP, including the DNSP development standards and those revised by the 2018 Addendum, that shape the form and character of development within Downtown by promoting coordinated and cohesive site planning and design; and the DNSP program EIR evaluated the environmental impacts of the DNSP buildout, including the Building Form Zone II.

## **1.2 - Agency Role**

### **1.2.1 - City of Napa—Lead Agency**

By virtue of the proposed project being located in the DNSP Planning Area and within the city limits, the City of Napa is the Lead 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 the preparation and certification of the DNSP EIR, the 2018 Addendum, and this Addendum.

## **1.3 - Purpose and Background**

When an EIR has been certified for a project, additional environmental review is only appropriate in limited circumstances (CEQA Guidelines § 15162). This document utilizes the process described in Section 15168 of the CEQA Guidelines for review of projects that may be within the scope of a development program that was the subject of a certified program EIR.

### **1.3.1 - Addendum to a Certified Program EIR**

When a program EIR is used to support approval of later activities within the program, the agency must examine those activities as they come up for approval to determine whether additional environmental review is required. If it determines that the activity’s environmental effects were examined in the program EIR and that a subsequent EIR would not be required, the agency may approve the activity as being within the scope of the project covered by the program EIR, and no



additional environmental documentation is required (CEQA Guidelines § 15168(c)(1)–(2), (c)(5), (e)). If some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR or negative declaration (ND) have occurred, CEQA states that “the lead agency . . . shall prepare an Addendum” to the certified EIR. This mandatory provision establishes that an Addendum is the appropriate CEQA document where it is determined that none of the conditions described in Section 15162 have occurred.

As activities within the program are approved, the agency must incorporate, if feasible, the mitigation measures and alternatives developed in the program EIR in its action approving the activity (CEQA Guidelines § 15168(c)(3)).

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

- 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 ND.
  - 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:

This EIR may be used for the following direct and indirect actions within the Planning Area:<sup>3</sup>

***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 DNSP Program EIR.
- Adopt required findings for the above actions, including required findings under CEQA Guidelines Sections 15090, 15091, and 15093.
- Adopt the DNSP.
- Adopt a Mitigation Monitoring and Reporting Program (MMRP).

Subsequent actions that may be taken by the City Council regarding the DNSP 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 pp. 3-17 and 3-18).

---

<sup>3</sup> "Planning Area" is defined as the Specific Plan Planning Area, which encompasses Downtown Napa, bound 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). These boundaries were later amended in October 2022 by the City of Napa 2040 General Plan, but that expansion does not impact the proposed project.

The City of Napa certified an EIR on October 4, 2022 to evaluate the impacts of the 2040 General Plan Update (SCH No. 2021010255; the “General Plan EIR,”) which also evaluated the City of Napa DNSP. Through the General Plan Update process, the City confirmed the DNSP’s goal to revitalize Downtown Napa into a vibrant place where residents and visitors alike come together to work, live, play, and actively engage in the community. The General Plan EIR evaluated the 2040 General Plan Update policies promoting, supporting, and facilitating further development in Downtown Napa in furtherance of the DNSP and recognized that the DNSP provides the guiding framework for realizing the vision of a vibrant, healthy, and balanced pedestrian-oriented City Center. The General Plan EIR recognized and evaluated that implementation of the General Plan could result in a net new development of up to 7,800 residential units, 817,000 square feet of office use, 631,000 square feet of retail use, and 1,799,000 square feet of industrial use, including development within the DNSP area. The General Plan EIR recognized in the General Plan Update that the DNSP includes allowable land uses, overlay districts, development standards, development incentives, design guidelines, circulation patterns, a parking strategy, and required utility improvements and that the greatest residential and commercial densities are allowed in the heart of Downtown. This includes the project site. The 2040 General Plan Update did not alter the analysis of environmental impacts on the project site contained in the DNSP EIR.

***Consistent with Prior City Action***

The analysis and conclusions contained herein constitute the appropriate level of environmental review for the proposed project in accordance with CEQA Guidelines Section 15168. CEQA Guidelines Section 15168 relies upon the approach set forth in CEQA Guidelines Section 15162 to determine whether development proposals are within the scope of the project covered by a program EIR. This approach is consistent with the fact that there have been at least three previous hotel project approvals within the DNSP area, all relying upon addendums to the DNSP EIR:

- The Archer Hotel: Use Permit and Design Review approvals for 183 hotel rooms and 27,000+/- square feet of commercial/restaurant/bar space.
- First and Oxbow Hotel: Use Permit and Design Review approvals for 123 hotel rooms.
- First Street Napa Phase II Project: Specific Plan Amendment, Zone Change, Planned Development Overlay approval, and Design Review approval for 78 multi-family housing units, 161 hotel rooms, and 30,000 square feet of retail space.

Each of the projects listed above was approved by the City Council, which found each to be within the development capacities established by the DNSP EIR and which determined that no new impacts would be created that were not already anticipated by the DNSP EIR.

***CEQA Guidelines Section 15162***

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 (ND) 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 ND 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 ND 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 ND was adopted, shows any of the following:
    - A. The project will have one or more significant effects not discussed in the previous EIR or ND;
    - 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.

If a proposed project is consistent with the development anticipated in the certified program EIR, no further environmental documentation is required. If some changes or additions are necessary but none of the conditions described above in CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR or ND have occurred, then CEQA mandates the preparation of an Addendum (CEQA Guidelines § 15164).

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or ND (CEQA Guidelines § 15164 (c)). The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the subject project (CEQA Guidelines § 15164 (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent or supplemental EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164 (e)), which should be included in the Addendum, the project findings, or elsewhere in the record and must be supported by substantial evidence.

## 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 DNSP (SCH 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 and approved the Specific Plan on May 1, 2012. Subsequently, in 2018, the City evaluated minor modifications to the DNSP EIR and approved those through the 2018 Addendum. The 2018 Addendum analyzed a 163-room hotel and parking structure with new project-specific zoning and historic rehabilitation standards but did not increase development intensity or environmental impacts beyond what was already approved. The 2018 Addendum to the DNSP EIR served to modify and update the original program-level DNSP EIR by addressing changes to the prior approved project and refining analyses where necessary. It did not replace the DNSP Certified Final EIR but supplemented it, ensuring that the environmental review remained accurate and legally sufficient in light of those changes.

The proposed project will be evaluated in the context of the program DNSP EIR with comparative discussion and analysis relative to the 2018 Addendum, meaning that the analysis in this Addendum builds upon and incorporates the prior environmental determinations and mitigation measures established in the DNSP EIR. The Certified Final EIR and Draft EIR and all technical appendices and documents incorporated therein are referred to collectively as the "DNSP EIR."

On October 4, 2022, the City of Napa certified the 2040 General Plan Update EIR (SCH No. 2021010255), which evaluated the impacts of the 2040 General Plan and included the development anticipated and evaluated in the DNSP and DNSP EIR.

The DNSP EIR is an informational document that informs 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 DNSP 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 project discussed in the DNSP EIR.

The DNSP EIR evaluated the potential environmental effects associated with development in the Planning Area (Table 1) consistent with 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 proposed project. Consistent with CEQA Guidelines Section 15168 and the DNSP EIR, this Addendum is being used for the environmental analysis of the proposed project, a subsequent development application that is a direct action within the Planning Area.

Consistent with CEQA, this Addendum evaluates whether any of the circumstances requiring additional environmental review under CEQA Guidelines Section 15162 are present and documents

the City's evaluation of the proposed project to describe how the City determined that the proposed project is within the scope of the development program described in the DNSP and evaluated in the DNSP EIR and would 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 DNSP EIR was reviewed and analyzed pursuant to CEQA Guidelines Section 15162 to determine whether any of the conditions calling for the preparation of a subsequent EIR have occurred, including any changes related to the proposed project that would result in new, significant environmental effects or more severe environmental impacts than those previously analyzed and disclosed in the DNSP EIR. The DNSP EIR evaluated the potential environmental impacts that could result from development under the DNSP and, in particular, 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.

The DNSP addressed development within the Planning Area through 2035. The DNSP EIR evaluated potential development and improvements on approximately 210 acres of land in Downtown and concluded that because the Planning Area includes only infill sites on land within an urban area surrounded by similar or compatible uses, it would not commit future generations to a significant change in land use.

In accordance with CEQA, the DNSP EIR contained a description of the DNSP, a 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. For purposes of its environmental analysis, the DNSP EIR used certain assumptions about how development would proceed under the DNSP in each use category (i.e., assumptions about the number of residential units and hotel rooms and the square footage of office and retail space) that might be constructed in the DNSP area through 2035. Based on these assumptions, the DNSP EIR determined, for each potential environmental impact, the level of significance of that impact from full buildout of the DNSP in all four use categories.

The DNSP itself, however, does not impose numerical limits on any of these uses, and actual development in the DNSP area has not conformed to the DNSP EIR assumptions in each category. In most categories (i.e., residential units, office space, and retail space), actual development has lagged far behind the assumptions used in the DNSP EIR, and in one case (hotel rooms), actual development has exceeded the assumption used in the DNSP EIR. Because CEQA concerns itself with the environmental effects from proposed development, without regard to the types of uses that are proposed, this Addendum evaluates whether or not the potentially significant environmental effects from the proposed project are within the scope of the significant effects from full buildout of all the uses permitted under the DNSP, given that actual development in the DNSP area is well below the assumptions used in the DNSP EIR in three of the four use categories.

The DNSP EIR also assessed whether any significant and unavoidable impacts would occur if the DNSP buildout reached or exceeded defined thresholds of significance and no feasible mitigation measures were available to reduce the significant impact to a less than significant level. The DNSP EIR revealed that the DNSP would result in the following significant and unavoidable environmental effects:

- Impact 4.B-1** Development facilitated by the Specific Plan would result in increased long-term emissions of criteria pollutants from increased vehicle traffic and on-site area sources.
- Impact 4.B-4** Growth from development facilitated by the Specific Plan would be fundamentally inconsistent with the growth assumptions of the Bay Area 2010 Clean Air Plan.
- Impact 4.B-5** Development facilitated by the Specific Plan would generate greenhouse gas (GHG) emissions that may have a significant effect on the environment.
- Impact 4.B-6** The Specific Plan could potentially conflict with applicable plans, policies or regulations of an agency with jurisdiction over the Specific Plan adopted for the purpose of reducing the emissions of GHGs.
- Impact 4.L-1** Traffic generated by development facilitated by the Specific Plan would affect levels of service at study intersections under Existing Plus Project conditions.
- SR-29 Northbound off-ramp/First Street
- Impact 4.L-2** Traffic generated by development facilitated by the Specific Plan would affect levels of service at study intersections under Cumulative plus Project conditions.
- Silverado Trail/Third Street/East Avenue/Coombsville Road
  - SR-29 Northbound off-ramp/First Street

The DNSP EIR evaluated potential environmental impacts from the incremental effect of development to determine what impacts would be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects when such impacts can result from a combination of the proposed project together with other projects causing related impacts. Cumulative impacts that could occur as a result of the DNSP were discussed in the DNSP EIR, which concluded that implementation of the DNSP would result in significant cumulative impacts as follows:

- Impact 4.B-4** Growth from development facilitated by the Specific Plan would be fundamentally inconsistent with the growth assumptions of the Bay Area 2010 Clean Air Plan.
- Impact 4.B-5** Development facilitated by the Specific Plan would generate greenhouse gas (GHG) emissions that may have a significant effect on the environment.
- Impact 4.B-6** The Specific Plan could potentially conflict with applicable plans, policies, or regulations of an agency with jurisdiction over the Specific Plan adopted for the purpose of reducing the emissions of GHGs.

**Impact 4.L-2** Traffic generated by development facilitated by the Specific Plan would affect levels of service at study intersections under Cumulative plus Project conditions.

- Silverado Trail/Third Street/East Avenue/Coombsville Road
- SR-29 Northbound off-ramp/First Street

With certain impacts determined to be significant and unavoidable, the Napa City Council adopted on May 1, 2012, “Findings of Fact and Statements of Overriding Considerations,” identifying numerous beneficial attributes of the overall DNSP project. When such a determination is made in a certified EIR, CEQA provides that the City Council may balance the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental impacts when determining whether to approve the DNSP. In the case of the DNSP, the City Council found that the benefits of the DNSP outweighed the significant unavoidable impacts because the DNSP will provide economic, social, and community benefits to the community through its comprehensive land use strategy, design guidelines, historic design guidelines, circulation improvements, sustainability measures, and visioning for future development in Downtown.

## 1.5 - Summary of Results

As demonstrated in Section 4, Environmental Checklist, the proposed project is within the scope of the overall development program that was the subject of the DNSP EIR and 2018 Addendum. This determination supports a finding that no additional environmental review is required for the proposed project under Public Resources Code Section 21166 or CEQA Guidelines Sections 15162 or 15168 and, therefore, requires the preparation of an Addendum.

## 1.6 - Format of Addendum

The DNSP 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 approvals of the proposed project. This Addendum also provides a brief summary of the impact analysis found in the DNSP EIR and 2018 Addendum and should be read together with the full text of the DNSP EIR and 2018 Addendum.

The DNSP EIR and 2018 Addendum are available at:

City of Napa  
1600 First Street  
Napa, CA 94559

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 proposed project in the context of the DNSP EIR and 2018 Addendum, the project location, site-specific operations, and key characteristics of the proposed project.
- Section 3, CEQA Guidelines Section 15168: Projects Consistent with Prior Environmental Documentation.
- Section 4, Environmental Checklist: Setting, Impacts, and Mitigation Measures, contains a discussion of the setting and the environmental impacts that could result from the proposed project relative to the impacts analyzed in the DNSP EIR and 2018 Addendum. The section also identifies the applicable mitigation measures from the DNSP EIR and 2018 Addendum that would reduce or eliminate these adverse impacts.
- Section 5, List of Preparers, contains a list of people who prepared this document and associated technical studies.

**THIS PAGE INTENTIONALLY LEFT BLANK**

## 2 - PROJECT DESCRIPTION

### 2.1 - Project Background

#### 2.1.1 - Downtown Napa Specific Plan

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 multimodal circulation within the Downtown and provides an implementation action plan to achieve its key objectives.

The DNSP area encompasses approximately 210 acres and is bound 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.

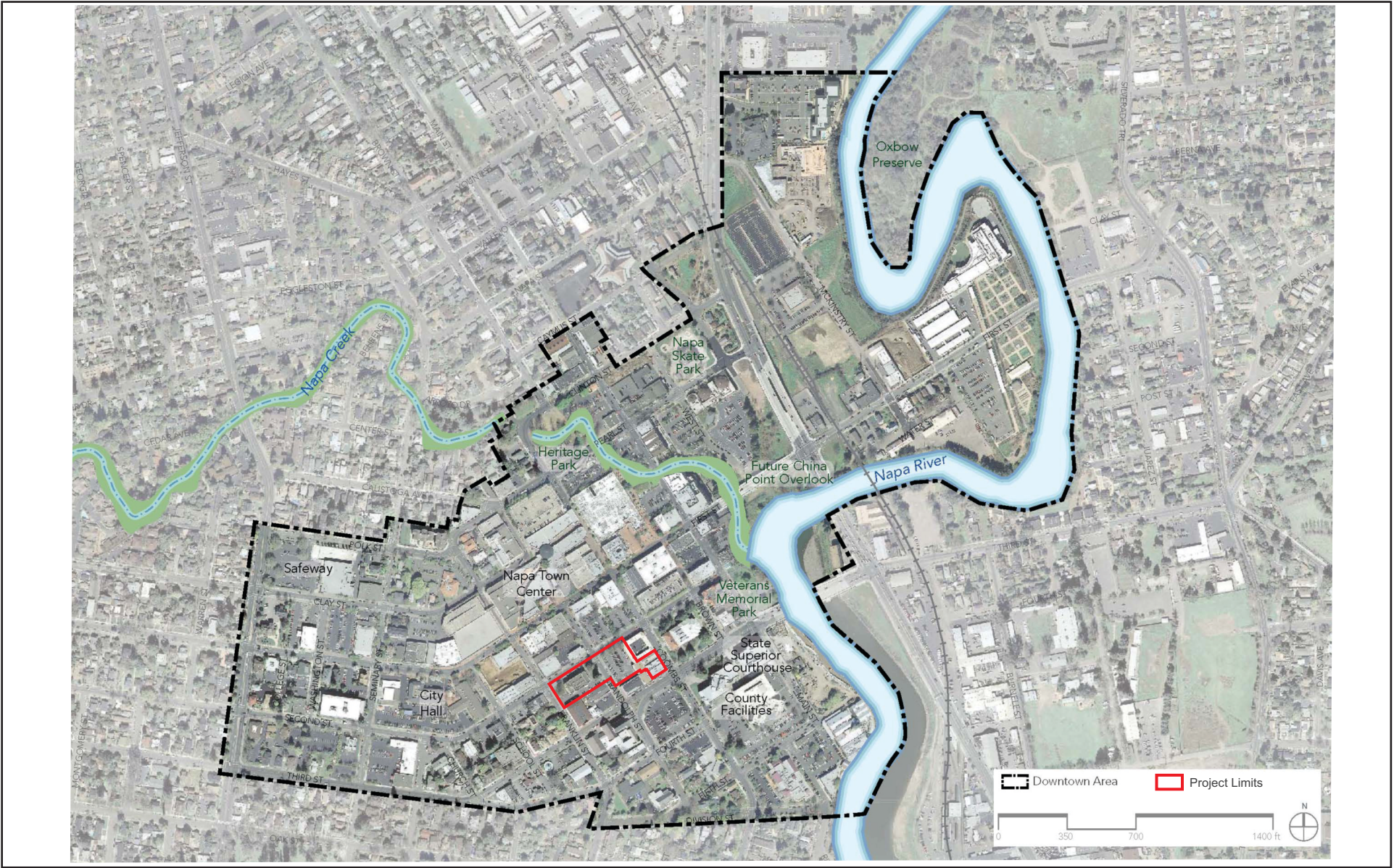
The DNSP area includes a diverse mix of land uses, including residential, lodging, retail, restaurant, office and civic uses. Most of the Downtown core, west of Soscol Avenue, is a diverse range of commercial uses ranging from small local shops and restaurants to larger-format retail. Office uses are 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. As of 2012 (publishing year of DNSP EIR) there were 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.

**THIS PAGE INTENTIONALLY LEFT BLANK**



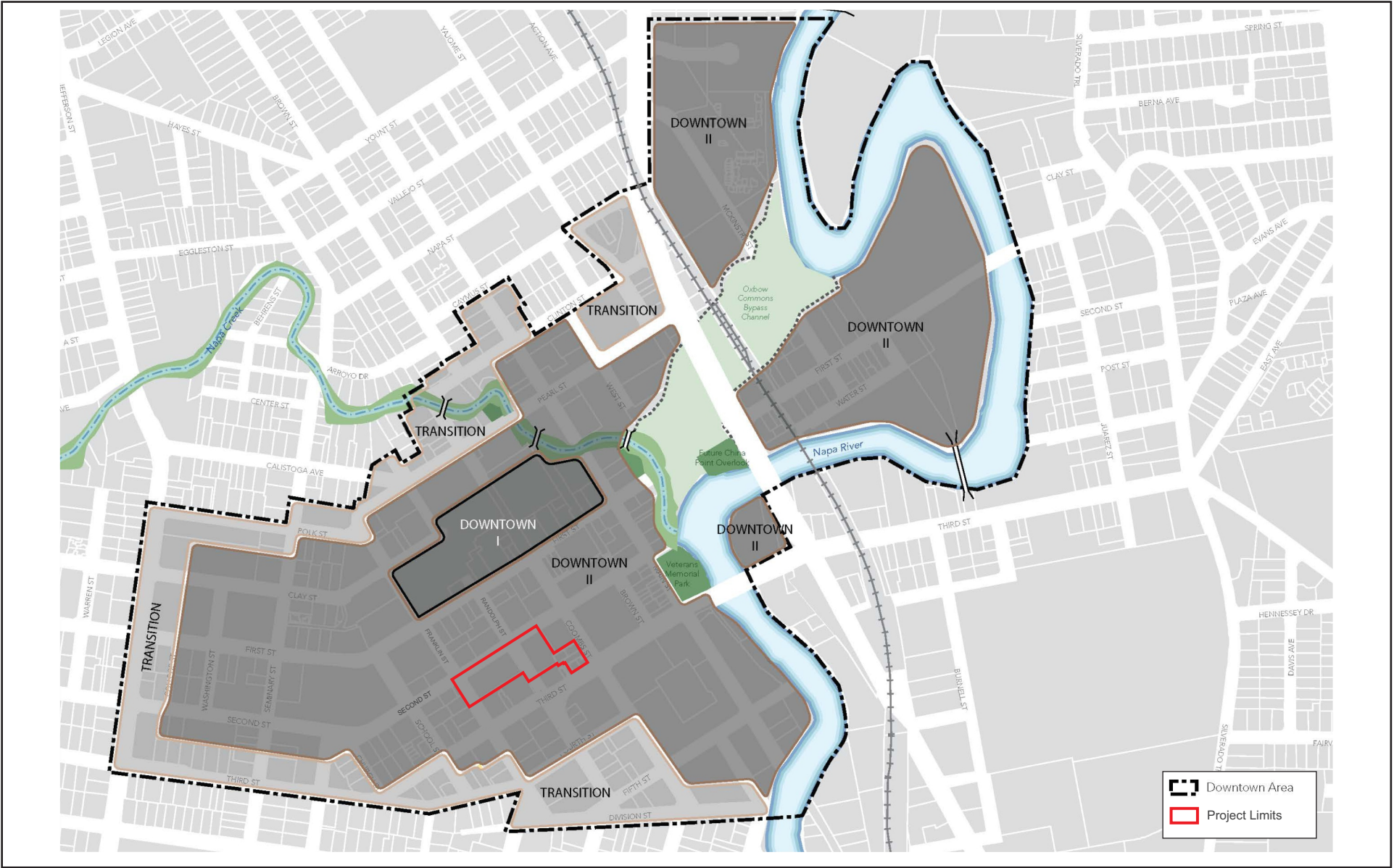


Source: City of Napa, Final Downtown Napa Specific Plan.

**Exhibit 1**  
Downtown Napa Specific Plan Planning Area

**THIS PAGE INTENTIONALLY LEFT BLANK**





Source: City of Napa, Final Downtown Napa Specific Plan.

**Exhibit 2**  
**Building Form Zones**

**THIS PAGE INTENTIONALLY LEFT BLANK**



- **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.

The project site is within the Downtown II Zone.

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, a 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.

### 2.1.2 - DNSP EIR

The DNSP EIR is an informational document to inform 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 DNSP 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 the increase of the number of residential units allowed would be 642 units.

### **2.1.3 - Historic Franklin Station Post Office**

The Franklin Station Post Office, designed by the Oakland firm Reed & Corlett, was constructed in 1933.<sup>4</sup> 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. From then it served as the main post office for the City of Napa for over 80 years. However, on August 24, 2014, the strongest earthquake in 25 years in the Bay Area shook Napa. At 6.0 magnitude, the event was the largest earthquake since the 1989 Loma Prieta earthquake and caused \$57.9 million in infrastructure damage. The Franklin Station Post Office was one of the many structures that suffered significant damage due to the earthquake, which forced its closure as an operating post office.<sup>5</sup> The Franklin Station Post Office has been a significant historic landmark in the City since its construction and was the main post office serving the City of Napa. As such, it was added to the National Register of Historic Places (NRHP) on January 11, 1985.

After the earthquake, the United States Postal Service (USPS) estimated that the repair and rehabilitation of the building, including necessary seismic upgrades, to make it functional again for USPS purposes would cost \$8 million (currently estimated at \$12 million because of increased labor and material costs as well as further deterioration of the building). As a result, the USPS planned to demolish the building at a cost of only \$500,000. However, these efforts were halted by a wave of public and local governmental support.

In the years following, the USPS, California Office of Historic Preservation (OHP), the City of Napa, and Napa County Landmarks (NCL) worked together to develop a Preservation Covenant for the sale of the property to a non-federal owner. The Preservation Covenant is based on retention and rehabilitation of the identified significant historic features.<sup>6</sup> The agencies and NCL worked on the covenant to protect the significant historic features of the building while the community tried to find a buyer for the property. NCL is the holder of the covenant.<sup>7</sup>

The Preservation Covenant contains a list of character-defining features (i.e., significant historic features) of the building and provides for alterations and additions for reuse and rehabilitation.<sup>8</sup> It specifies that the new owner will develop an adaptive reuse of the property which will include significant alterations and additions, including to the side, rear, and rooftop, along with demolition of

---

<sup>4</sup> Napa County Historical Society. 2025. Napa County Landmarks, 50 Years. Website: <https://napahistory.org/programs/tvb-architecture/napa-county-landmarks/>. Accessed October 30, 2025.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Napa County Landmarks, Inc. 2017. Preservation Covenant. February 23.

the non-contributing portions of the post office structure located behind the retained historic building. As part of USPS's sale of the property, the applicant agreed to enter into the Preservation Covenant with NCL, which agreed to provide 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.

The DNSP contains the Downtown Napa Historic Resources Design Guidelines (Historic Design Guidelines). The Historic Design Guidelines provide specific instructions for the treatment of each historic resource within the DNSP area, including the Franklin Station Post Office. With Resolution R2018-134, the City Council amended the DNSP to revise the Historic Design Guidelines to account for the building's planned rehabilitation for use as a hotel,<sup>9</sup> outline significant historic features that should be preserved through redevelopment, and provide guidance for new additions and construction practices.

### 2.1.4 - Prior Approved Project and 2018 Addendum

In light of the federal government's decision, the applicant team acquired the property with the intent to bring the earthquake-damaged post office building back to life by repurposing the structure for another commercially viable use. In furtherance of that effort, the applicant submitted a development permit application to the City to rehabilitate the historic post office building and develop the property and the adjacent Ace Hardware property to the north as a hotel with 163 rooms, ancillary retail, and related amenities and to develop an automated parking structure with ancillary improvements, including up to 7,000 square feet of ground floor retail/restaurant/commercial.

In furtherance of the prior approved project, the City Council, upon the Planning Commission's recommendation, approved and adopted the 2018 Addendum to the DNSP EIR on November 13, 2018 pursuant to Ordinance O2018-013, as well as amendments to the General Plan, DNSP, and Zoning Code, and authorized the execution of a Development Agreement, among other entitlements.

The entitlements granted for the prior approved project remain valid and in effect, and consist of:

- Resolution R2018-0132 changing the General Plan designation of 1351 Second Street from "Downtown Public" to "Downtown Mixed Use"
- Resolution R2018-133 amending the DNSP to redesignate 1351 Second Street from "Downtown Public" to "Downtown Mixed Use"
- Resolution R2018-134 approving a Certificate of Appropriateness to revise the Downtown Napa Historic Design Guidelines for the Franklin Station Post Office

---

<sup>9</sup> Page and Turnbull. 2012. Downtown Napa Historic Resources Design Guidelines—City of Napa. Pages 116–117. March 9.

- Resolution R2018-135 authorizing the City Manager to execute the First Amendment to the agreement to sell the surface parking lot at the corner of Second and Randolph
- Ordinance O2018-013 amending the zoning map to rezone 1351 Second Street from DP (Downtown Public) to DMU (Downtown Mixed Use)
- Ordinance O2018-014 establishing Planned Development Overlay District PD-37
- Ordinance 2018-015 adopting a Development Agreement

The existing prior approved project entitlements anticipated that the applicant would return to the Planning Commission and City Council for a Design Review Permit to verify the future architectural design complies with the design parameters adopted in 2018. In addition, the applicant was to return to the Cultural Heritage Commission to verify the future design's consistency with the Historic Design Guidelines, as revised by City Council Resolution R2018-134, for purposes of making a recommendation to the City Council as to the approval of another Certificate of Appropriateness (Appendix A). Because of the economic infeasibility of the parking structure proposed under the prior approved project, it was never constructed, and the applicant reconfigured and redesigned the proposed project, which requires amendments to the prior approved project entitlements, as well as a new Development Agreement.

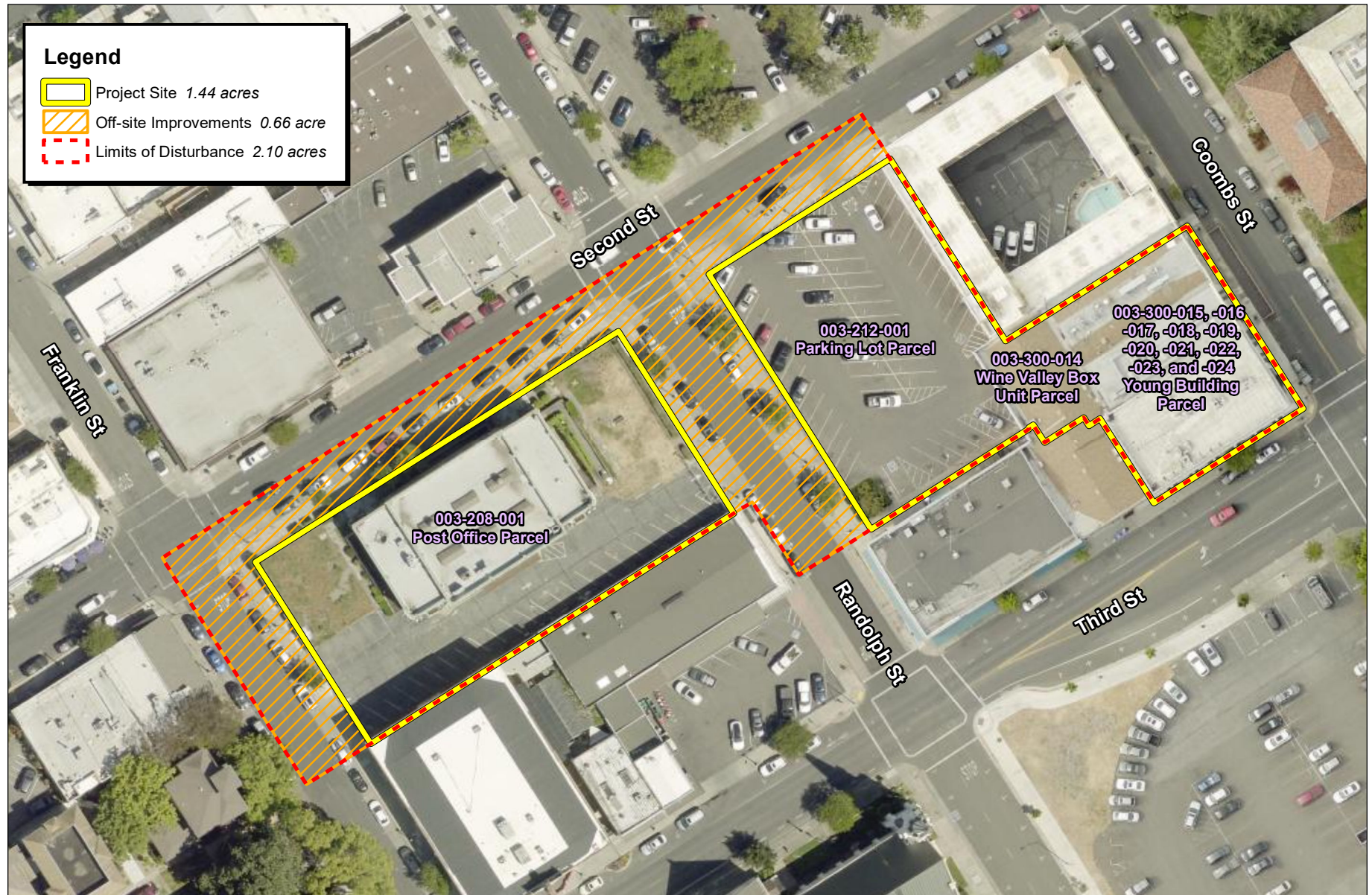
## **2.2 - Location and Setting**

### **2.2.1 - Location**

The proposed project is located in the City of Napa, Napa County, California, and is within the Downtown II Zone of the DNSP. The City is located in the southern portion of Napa County and is bordered by the City of Yountville to the north and the City of American Canyon to the south. There are foothills and agricultural lands to the east and west of the City. The foothills of the Mayacamas Mountains are to the west, and the foothills of the Vaca Mountains are to the east. The project site is located on the Napa, California United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map.

The project site is divided into two sections on the corner of Second Street and Randolph Street encompassing the **Post Office Parcel**, **Parking Lot Parcel**, **Wine Valley Box Unit Parcel**, and **Young Building Parcel**, as depicted in Exhibit 3 (Existing Conditions). The Post Office Parcel is located on the western side of Randolph Street, while the remaining parcels are located on the eastern side of Randolph Street. The approximately 1.44-acre project site includes 0.66 acre of off-site improvements associated with underground utility connections immediately adjacent to the project site on Second and Randolph Streets that result in an overall disturbance area of no greater than 2.10 acres. Regional access to the site would be provided by State Route (SR) 121 and SR-29. Local access would be provided via Second Street, Randolph Street, and Franklin Street. The project site is 0.11 mile west of Third Street at Brown Street bus stop.





Source: ESRI World Imagery. RSA+ , October 15, 2025. Napa County.



**THIS PAGE INTENTIONALLY LEFT BLANK**

## 2.3 - Environmental Setting

### 2.3.1 - Existing Land Use Activities

The project site is currently developed with the historic Franklin Station Post Office building, as well as a 55-space parking lot and the Young Building, which contains commercial uses on the first floor and residential condominiums on the second floor.

### 2.3.2 - Surrounding Land Uses

Residential, commercial, and public service uses surround the project site.

#### North

A surface level parking lot, restaurants, and several clothing stores are located to the north.

#### South

Commercial uses and parking lots are located to the south, as well as a church with an attached school further south.

#### East

The Napa Valley Hotel and Suites, restaurants, and the Napa County Civil Courthouse are located to the east.

#### West

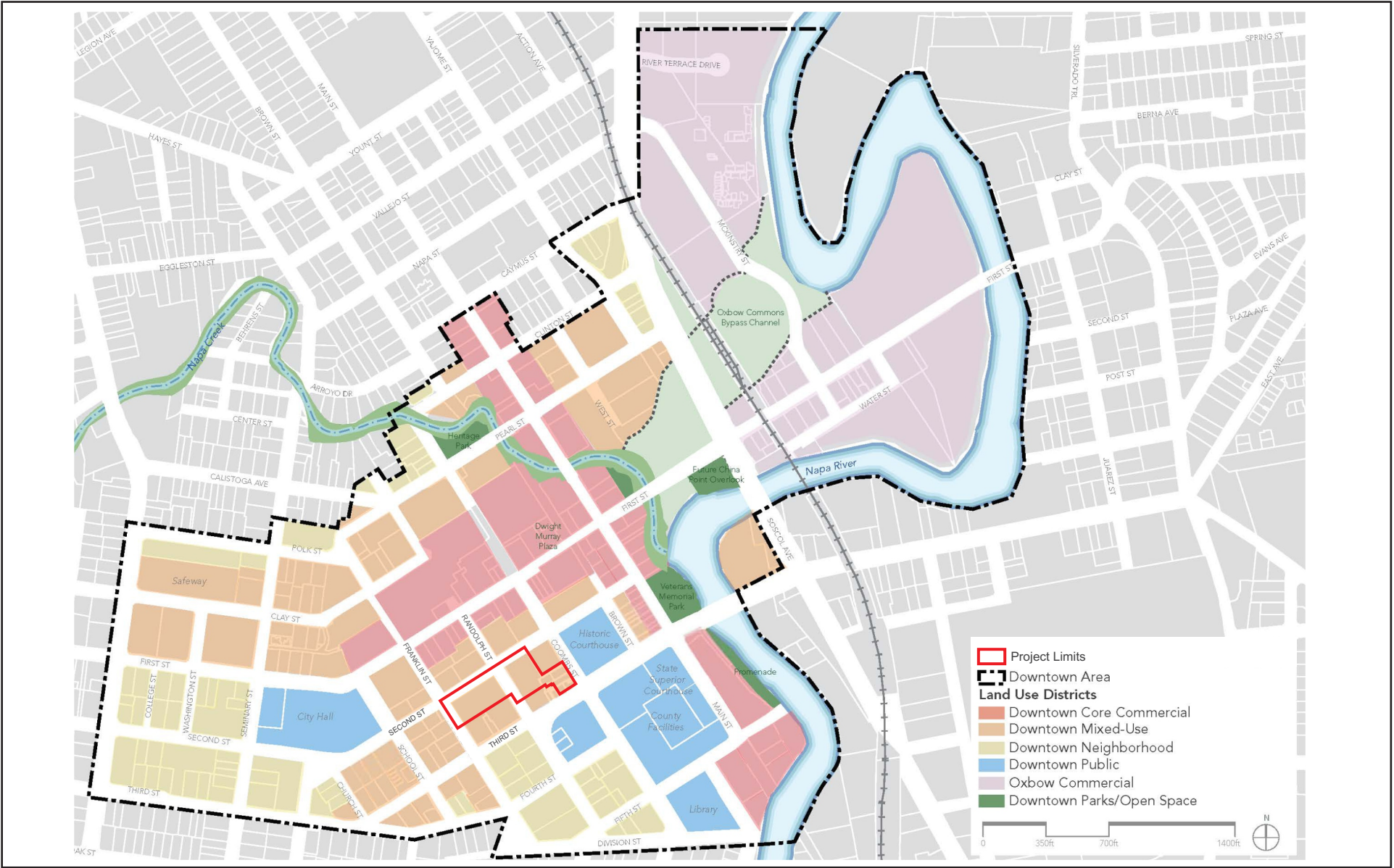
Several offices, restaurants, and a multi-family residential building are located to the west.

### 2.3.3 - Land Use Designation and Zoning

The project site is within the boundaries of the DNSP. As stated above, the prior approved project was subject to a General Plan Amendment, DNSP Amendment and zone change which redesignated and rezoned the **Post Office Parcel** to DMU. All other parcels (**Parking Lot Parcel, Wine Valley Box Unit Parcel, Young Building Parcel**) are also designated DMU by the DNSP and zoned DMU by the City's zoning ordinance (Exhibit 4). The DNSP also mandates development density through its Building Form Zones. The project site is within the DNSP's Downtown II Building Form Zone, which has a maximum development density of 40 du/ac.

**THIS PAGE INTENTIONALLY LEFT BLANK**





Source: City of Napa, Final Downtown Napa Specific Plan.

**Exhibit 4**  
Downtown Napa Specific Plan Land Use Designations and Zoning

**THIS PAGE INTENTIONALLY LEFT BLANK**

The DMU zoning district/land use designation 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.<sup>10</sup> The DMU designation/zoning also encourages residential uses primarily as part of a mixed-use designation.

With the exception of the Young Building Parcel, the project site is also within the Planned Development Overlay District PD-37 (PD-37 Overlay) established under the prior approved project. The PD-37 Overlay contains standards and additional guidelines intended to ensure the project's conformance to the DNSP standards and design guidelines applicable to the proposed project. The PD-37 Overlay also includes height allowances up to 75 feet for rooftop patios with food and bar service, including restrooms and food and bar service structures, provided that such features are accessory to the main use of the site and are set back to minimize visibility from the street.

## 2.4 - Project Characteristics

The project applicant proposes to redevelop the Franklin Station Post Office building on the Post Office Parcel with a 5-story hotel with up to 120 rooms (a decrease from the 163 rooms approved under the prior approved project) with accessory uses such as rooftop café and bar,<sup>11</sup> rooftop pool, restaurant and bar, event/meeting spaces, lobby lounge, spa and fitness center, and basement speakeasy which would maintain typical hours consistent with similar operations in the DNSP area.

The hotel development area include up to 5,400 square feet of common area (including lobby, lounge areas and restroom areas), 6,220 square feet of spa uses, 6,390 square feet for fitness uses (including a rooftop pool), 10,340 square feet of meeting/banquet space, 8,670 square feet for food and beverage uses (including a lobby bar/lounge, rooftop bar, and ground floor restaurant) and 43,870 square feet for back-of-house support and service areas (including office administration, food service/kitchen, security, maintenance, and mechanical systems).

The project applicant intends to preserve the significant historic features of the post office building and would redevelop the building in accordance with the Preservation Covenant and the City's Historic Guidelines.<sup>12</sup> The redevelopment of the Franklin Station Post Office building would consist of 121,480 square feet of development, in addition to 4,650 square feet of the existing Franklin Station Post Office building which is to be retained and restored. The southern portion of the existing Franklin Station Post Office building would be demolished, as part of the proposed project, while the front façade and significant historic features would be preserved.

For the remaining parcels (Parking Lot Parcel, Young Building Parcel, and Wine Valley Box Unit Parcel) comprising the mixed-use development area, the project applicant proposes a 5-story mixed-

<sup>10</sup> City of Napa. 2012. Downtown Napa Specific Plan (DNSP), Chapter 4, Land Use Designations and Zoning Districts. May.

<sup>11</sup> Hours of operation for the rooftop café and bar would be from 8:00 a.m. to 11:00 p.m.

<sup>12</sup> FirstCarbon Solutions (FCS). 2018. Franklin Post Office Project Addendum to the Downtown Napa Specific Plan Environmental Impact Report. (State Clearinghouse Number: 2010042043). October 9.

use structure plus a rooftop unit set back from the street, with up to 37 for-sale hotel units and accessory uses on the Parking Lot Parcel and Wine Valley Box Unit Parcel. The existing surface parking lot would be removed as part of the proposed project. On the second floor, the new mixed-use structure would connect with three existing residential condominium units on the second floor of the Young Building.<sup>13</sup> In sum, the proposed project includes up to 40 for-sale hotel units (37 newly constructed and three existing units).

The mixed-use development area includes up to 11,170 square feet of common area (including lobby, lounge, courtyard, and roof deck), 1,000 square feet of fitness area, 13,090 square feet of support and service areas (including office administration, security, and mechanical systems), 1,180 square feet of ground floor commercial (a café with outdoor space), and 14,940 square feet of ground level parking. For-sale hotel units would likely be comprised of 2-bedroom units ranging from 1,700 to 1,850 square feet and 3-bedroom units ranging from 2,090 to 2,900 square feet.

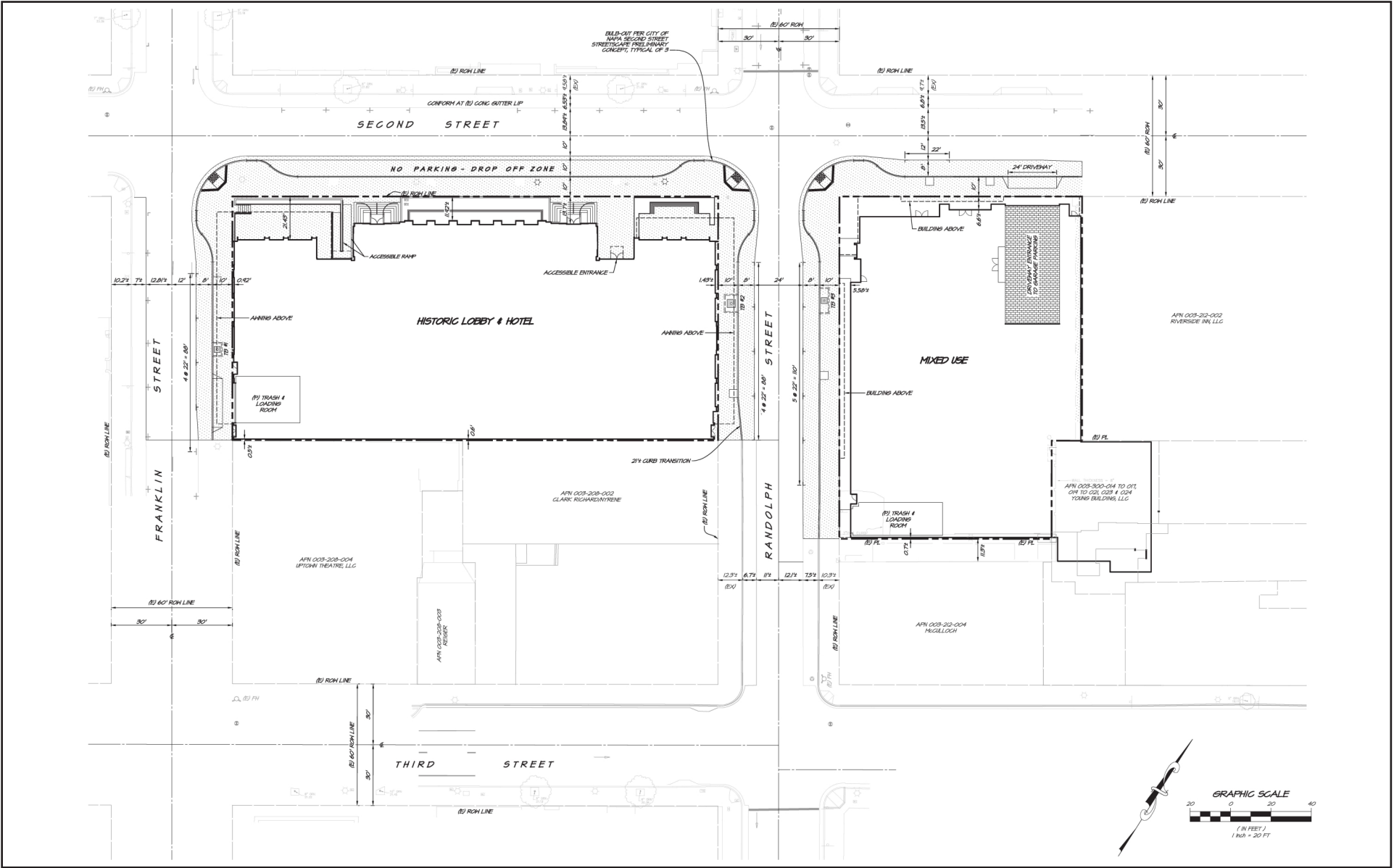
The ground floor portion of the mixed-use building would include a neighborhood-serving commercial use such as a café on the corner of Second Street and Randolph Street, as well as a single-story ground floor parking garage dedicated to primarily for-sale hotel unit parking containing 34 stalls (up to 40 stalls with use of valet service), including Americans with Disabilities Act (ADA) accessible spaces, electric vehicle (EV) charging stations, and a single stall dedicated to retail. The mixed-use development area would equal 67,610 square feet of mixed use development (Exhibit 5 and Exhibit 6). In the event that the project developed more than 30 for-sale hotel units (never exceeding a total of 40 units), the ground floor parking garage would include a valet parking program or include stacked parking program to accommodate all for-sale hotel unit parking needs.

The new Development Agreement would allow the project to reduce the number of hotel rooms and for-sale hotel units, as well as modify the respective development areas within the hotel development area and mixed-use development area without increasing the total square footage of the proposed project. The Development Agreement also allows the proposed project to allocate for-sale hotel units within either the hotel development area or the mixed-use development area while remaining within the total number of units analyzed in this Addendum. Notwithstanding a developer's ability to decrease the intensity of the proposed project, the environmental analysis presented in this Addendum conservatively assumes a "maximum development" scenario. Any developer modifications facilitated under the Development Agreement would primarily affect the interior portions of each building without substantially changing the exterior areas. As a result, this Addendum also assumes the general building exterior design (e.g., form, massing, height, etc.) of the proposed project would not change.

Table 2 compares the development contemplated by the DNSP EIR with the development proposed under the prior approved project (2018 Addendum), and the development under the proposed project.

---

<sup>13</sup> APNs 003-300-022, 003-300-023, and 003-300-024 correspond to existing condominium units on the second floor of the Young Building to be redeveloped.



Source: RSA+, 06/23/2026.

Exhibit 5  
Site Plan Layout

**THIS PAGE INTENTIONALLY LEFT BLANK**





Source: BAR architects & interiors, August 28, 2025.

Exhibit 6  
Illustrative Site Plan



**THIS PAGE INTENTIONALLY LEFT BLANK**

**Table 2: Summary of Proposed Changes**

| Project Element                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | DNSP EIR                             | Prior Approved Project/2018 Addendum            | Proposed Project                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------|-------------------------------------------------|
| Total Project Square Feet<br>(including parking and historic post office)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 579,179<br>(retail and office space) | 253,144 <sup>1</sup>                            | 245,810 <sup>2</sup>                            |
| Hotel Rooms                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 300–500                              | 163                                             | 120                                             |
| Residential Units <sup>3</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 242                                  | None                                            | 40 (for-sale hotel units)                       |
| Maximum FAR                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3.0–5.0                              | 4.0                                             | 4.0                                             |
| Maximum Height (feet)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 35–60                                | 75                                              | 75                                              |
| Floors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Not Specified                        | 5, with rooftop structures set back from street | 5, with rooftop structures set back from street |
| Notes:<br>DNSP EIR = Downtown Napa Specific Plan Environmental Impact Report<br>FAR = floor area ratio<br><sup>1</sup> The 2018 Addendum included a similar level of detail as to square footage breakdown, noting that the project would result in a total of 173,396 square feet with a total of 78,748 square feet in the parking structure, which included up to 7,000 square feet of ground floor retail. The 2018 Addendum did not break down the total square footage information into further detail.<br><sup>2</sup> This includes 230,870 square feet of hotel and mixed-use project area and 14,940 square feet of parking.<br><sup>3</sup> Indicates maximum unit counts, which may be reduced pursuant to the development agreement. |                                      |                                                 |                                                 |

### 2.4.1 - Proposed Land Use Designation and Zoning

Under the proposed project, land use designations under the DNSP and zoning would remain the same. The proposed project would, however, include amendments to the PD-37 Overlay. The proposed amendments to the existing PD-37 Overlay are not a substantial departure from the existing standards granted under the prior project approvals (Appendix B). The proposed amendments would allow owners of the for-sale hotel units to place their units within the hotel's rental program and be used for transient purposes, such as a timeshare, and delete the allowance of using the for-sale hotel units as a condo-hotel. The proposed project would also modify the boundary of the PD-37 so the overlay includes the Young Building Parcel and no longer includes the Ace Hardware property.

The DNSP contains uses, standards, and design guidelines applicable to development projects located within the Planning Area which are further detailed in the PD-37 Overlay.

The uses permitted by the PD Overlay generally follow those found in the DMU, including entertainment, food and beverage, service commercial, and general retail. The project-specific development standards established by the PD Overlay substantially conform to the current development standards for the DNSP Downtown II Zoning District as outlined in Table 3 below.

The additional PD Overlay standards itemize the proposed project's floor area ratio (FAR), number of hotel and for-sale hotel units, use of the top floor space, and parking. The specific development standards for the PD Overlay are listed below in Table 3:

**Table 3: PD-37 Overlay Development Standards Comparison**

| <b>Building Form Standards</b>                       | <b>Downtown II (Under DNSP)</b>                                      | <b>PD-37 Overlay (Under 2018 Addendum)</b>                                                                                                                                                                                                              | <b>PD-37 Overlay Amendments</b>                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Floor area ratio (FAR)                               | Up to 4.0 FAR                                                        | Up to 4.0 FAR                                                                                                                                                                                                                                           | Up to 4.0 FAR<br>For purposes of calculating FAR, subterranean areas of a structure shall be excluded.                                                                                                                                                                                                                                                            |
| Residential Density (dwelling units/acre or du/acre) | 20 (Min) to 40 (Max) du/ac                                           | 20 (Min) to 40 (Max) du/ac                                                                                                                                                                                                                              | 20 (Min) to 40 (Max) du/ac                                                                                                                                                                                                                                                                                                                                        |
| Building Height (feet)                               | Max 60 feet                                                          | Maximum of 75 feet for rooftop patios with food and bar service, including restrooms and food and bar service structures, provided that such features are accessory to the main use of the site and are setback to minimize visibility from the street. | Maximum of 75 feet for (i) residential structures where the top floor is setback to minimize visibility from the street and (ii) rooftop patios with food and bar service, including restrooms and food and bar service structures, provided that such features are accessory to the main use of the site and are setback to minimize visibility from the street. |
| Front Setback                                        | Max 15 feet                                                          | Max 15 feet                                                                                                                                                                                                                                             | Max 15 feet; setback may be exceeded for Post Office Redevelopment to ensure new front façade sits behind the historically significant façade of the Post Office. <sup>1</sup>                                                                                                                                                                                    |
| Side Setback                                         | No requirement                                                       | No requirement                                                                                                                                                                                                                                          | No requirement                                                                                                                                                                                                                                                                                                                                                    |
| Rear Setback                                         | No requirement                                                       | No requirement                                                                                                                                                                                                                                          | No requirement                                                                                                                                                                                                                                                                                                                                                    |
| Step backs                                           | The side of a building facing adjacent residential structures in the | Per Project Specific Design Guidelines                                                                                                                                                                                                                  | Per Project Specific Design Guidelines                                                                                                                                                                                                                                                                                                                            |

| Building Form Standards                                                                                                                                                                                                                             | Downtown II (Under DNSP)                                                       | PD-37 Overlay (Under 2018 Addendum)               | PD-37 Overlay Amendments                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------|---------------------------------------------------|
|                                                                                                                                                                                                                                                     | Downtown II areas must step back the third story and above a minimum of 5 feet |                                                   |                                                   |
| Minimum Lot Area (square feet)                                                                                                                                                                                                                      | 5,000 (west of Soscol)<br>10,000 (east of Soscol)                              | 5,000 (west of Soscol)<br>10,000 (east of Soscol) | 5,000 (west of Soscol)<br>10,000 (east of Soscol) |
| Lot Width (feet) at front setback line                                                                                                                                                                                                              | 50                                                                             | 50                                                | 50                                                |
| Lot Frontage (feet) at front property line                                                                                                                                                                                                          | 50                                                                             | 50                                                | 50                                                |
| Notes:                                                                                                                                                                                                                                              |                                                                                |                                                   |                                                   |
| <sup>1</sup> The project applicant intends to preserve the significant historic features of the post office building and would redevelop the building in accordance with the Preservation Covenant and the City's Historic Guidelines (Appendix A). |                                                                                |                                                   |                                                   |

The proposed project includes minor updates to the Design Guidelines (Appendix C) in order to incorporate the new mixed-use structure and remove the parking garage incorporated under the previous iteration of the project.<sup>14</sup> The Design Guidelines for the hotel component have not changed compared to the previous iteration of the project. The Design Guidelines are intended to modify and be additive to the guidelines contained in the DNSP and Zoning Code. Because the PD-37 Zoning Overlay and Design Guidelines are more detailed and created specifically for the proposed project, these would take precedent over the DNSP Regulations and Guidelines.

The PD Overlay ties together the Design Guidelines and Development Agreement as implementation components of the proposed project.

## 2.4.2 - Site Access and Circulation

### Parking

Parking for the proposed for-sale hotel units would be on-site on the ground floor of the mixed-use structure. While the site is within the City's parking exempt overlay, the proposed project would provide a minimum of one vehicular parking space per for-sale hotel unit for the mixed-use component and 0.8 parking spaces per hotel unit. The ground floor of the mixed-use structure would include a café on the corner of Second Street and Randolph Street, as well as a single-story ground floor parking garage dedicated to resident use and the café parking containing 34 stalls as currently designed or up to approximately 40 stalls with a valet program. Parking would be regulated by the Development Agreement and the PD Overlay. As noted in the Development Agreement, in the event that the proposed project developed more than 30 for-sale hotel units (not to exceed a total of 40

<sup>14</sup> There are no changes to the site-specific Historic Guidelines specific to the rehabilitation of the post office structure as incorporated under the DNSP.

units), the proposed project must incorporate valet parking, parking stackers, or an equivalent program, such that there would be one parking space for each for-sale hotel unit incorporated into the proposed project.

As provided in the Development Agreement, the future location of parking spaces for the hotel and accessory uses would be located off-site on one or more public parking facilities as contemplated under the DNSP. The ultimate location or locations of these parking areas are not known at this time and are subject to the City's discretion, but would be within the DNSP Planning Area. Because of the uncertainty of the volume of the valet parking operation and the resulting circulation patterns, a valet parking operation plan would be developed for the hotel and accessory uses. The plan would include items such as hours of operation, location of valet stand, location of parking lots to be used, route of vehicles being moved to and from the site, and copies of any contractual agreements between the valet operator and parking lots.

If the applicant elects to phase the proposed project, which would first consist of developing the hotel and accessory uses on the Post Office Parcel and then the adjacent mixed-use development in the future, the applicant would be able to supply all or a substantial portion of the parking required for the first phase on the Parking Lot Parcel, which contains approximately 55 striped parking spaces. The number of project parking spaces required within public parking facilities for phase one would be reduced on a one-for-one basis.

### **Vehicular Circulation and Access**

Vehicles associated with the for-sale hotel units and accessory café would have access to the on-site parking garage dedicated to the for-sale hotel units via a 24-foot-wide driveway from Second Street. There would be a drop-off zone directly adjacent to the hotel frontage along Second Street as well. Fire access would be provided via Randolph Street and Second Street.

### ***Project Safety Features***

As part of the proposed project, the access driveway on Second Street would employ design features aimed at improving safety for vehicles entering and exiting the proposed parking garage. These features would include: a sign with flashing lights visible to pedestrians on the Second Street sidewalk fronting the building that is activated by vehicles exiting the garage; a convex mirror at the garage exit, positioned to allow drivers exiting the garage to see approaching eastbound vehicles on Second Street; and a stop sign or exit gate immediately before the sidewalk at the garage exit.

### **Bicycle Circulation and Access**

The proposed project would incorporate features that support bicycle access as part of its commitment to sustainable transportation and mobility options. To ensure these facilities meet City standards, community needs and State requirements, the exact location and configuration of bicycle parking would be finalized during the building permit stage and would be subject to the City's approval.

## **Pedestrian Circulation and Access**

Pedestrians would access the project site from renovated sidewalks along Second Street and Randolph Street that would connect to existing pedestrian facilities along these roadways. The sidewalk adjacent the proposed project along Franklin Street would also be renovated, and would be the primary building access point for employees and vendors. Existing four-way crosswalks are located at the intersections of Second Street and Randolph Street and Second Street and Franklin Street. The project site is also approximately 0.11 mile west of the Third Street at Brown Street bus stop.

### **2.4.3 - Design and Appearance**

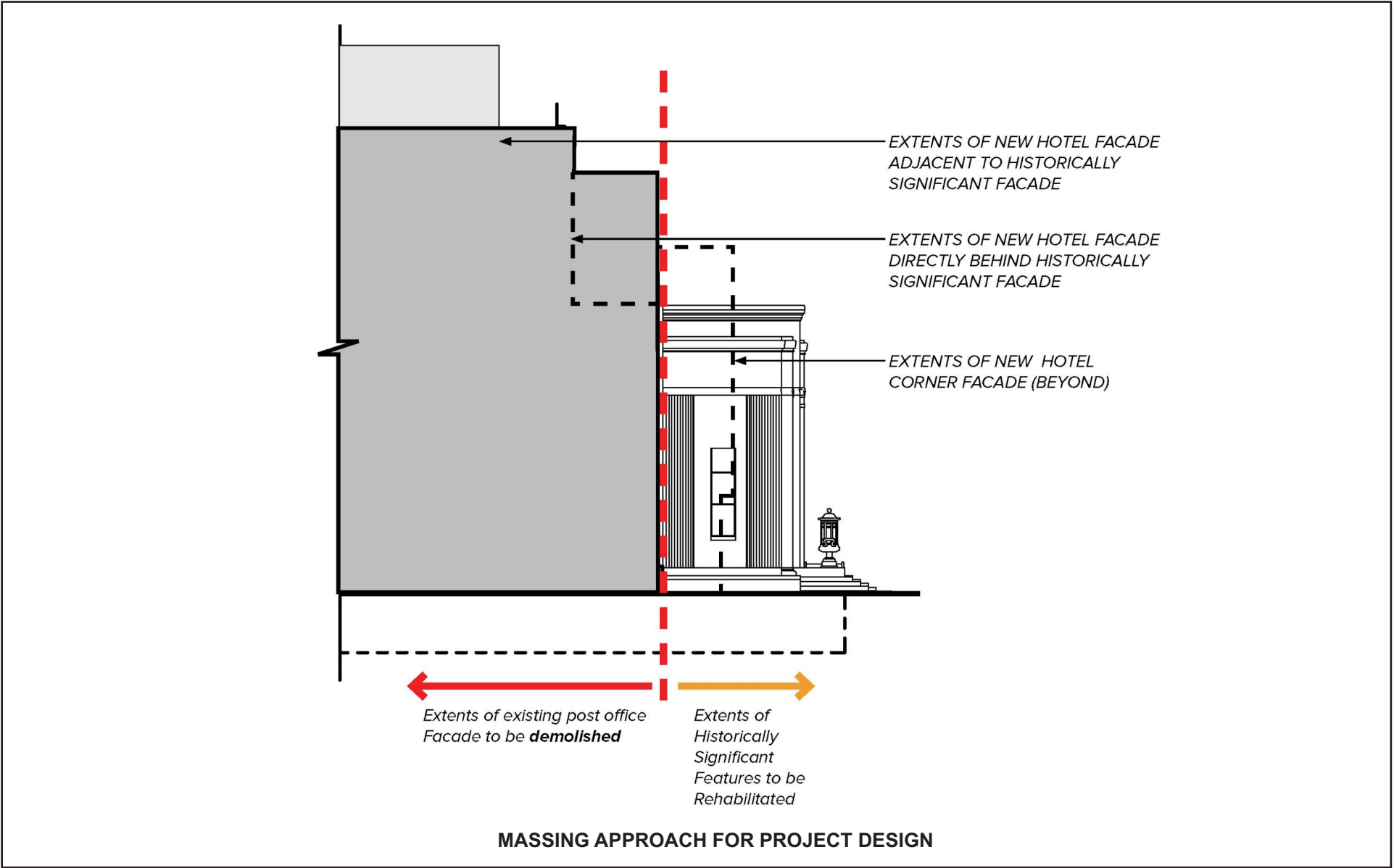
The proposed project would include a hotel design that emanates from the historic Franklin Station building façade and carries through to all areas of the larger project, including the proposed mixed-use structure. The existing art deco façade would verify the Franklin Station's history and authenticity as being a defining Napa landmark. That character would carry through to the interior public spaces as appropriate, while also infusing more contemporary elements. Overall, the architecture of the proposed project is designed to:

- Preserve the character-defining features of the historic Post Office as identified in historic reports and surveys;
- Comply with the Secretary of the Interior's Standards for Rehabilitation of Historic Structures;
- Configure the additions in a manner where the historic Post Office remains the focus and centerpiece of the proposed project; and
- Provide continuity over time by harmonizing the architectural character vis a vis complement and contrast of the new modern additions and the existing structure.

Upper stories of the hotel would incorporate setbacks with balconies and roof gardens to maintain a pedestrian scale and to separate from the historic aesthetic of the post office's front façade (Exhibit 7). The design and architecture of the proposed mixed-use structure would draw inspiration from the proposed hotel, featuring timeless materials and a subdued aesthetic that would complement the historical context. The architectural approach would emphasize a seamless integration with Napa's urban fabric, offering a sense of belonging and authenticity (See Exhibit 8 and Exhibit 9, for historical design features).



**THIS PAGE INTENTIONALLY LEFT BLANK**



Source: BAR architects & interiors, August 28, 2025.

**THIS PAGE INTENTIONALLY LEFT BLANK**



Source: BAR architects & interiors, August 28, 2025.

**Exhibit 8**  
Significant Historic Features

**THIS PAGE INTENTIONALLY LEFT BLANK**





- ① MASSING: PULL FACE BACK SO POST OFFICE SITS PROUD OF BUILDING
- ② MASSING: STEP TOP STORIES BACK TO REDUCE APPARENT MASS OF BUILDING
- ③ MASSING: SYMMETRICAL 'DUMBBELL' SCHEME CENTERED ON POST OFFICE
- ④ MASSING: 'LIFT' BUILDING OFF GROUND TO EMPHASIZE MASS/'GROUNDED' P.O.
- ⑤ MATERIALITY: UTILIZE BRICK AS PRIMARY BUILDING MATERIAL, FLANKING P.O.
- ⑥ MATERIALITY: UTILIZE BRONZE METAL, RECALLING TRIM AND DETAILING ON P.O.
- ⑦ MATERIALITY: DARK BUILDING DIRECTLY BEHIND P.O. TO RECEDE FROM VIEW
- ⑧ DETAILING: POST OFFICE FACADE SET INTO SIMPLE GLAZED WALLS ON EITHER SIDE
- ⑨ LANDSCAPE: INVITING PUBLIC PLAZA AT CORNER OF 2ND AND RANDOLPH
- ⑩ FRONT DOOR: EXPERIENCE ENTERING HOTEL IS THRU P.O. 'ARRIVAL GALLERY'

Source: BAR architects & interiors, August 28, 2025.

## Exhibit 9 Design Features

**THIS PAGE INTENTIONALLY LEFT BLANK**



### 2.4.4 - Landscaping

Existing landscaping, consisting of ornamental features along the frontage of the existing Franklin Station Post Office building, would be removed during project construction. The proposed project would incorporate trees and plants that are native to the area and drought resistant. Trees and smaller vegetation in planter boxes would line the pedestrian sidewalks, rooftop gathering spaces, and amenity areas. The proposed project is designed to include species that provide shade.

### 2.4.5 - Lighting

The lighting design for the proposed project aims to enhance the property's architectural identity while supporting a safe, pedestrian-oriented environment that aligns with the City of Napa's lighting regulations. All exterior lighting will be carefully shielded and directed to ensure illumination is confined to the subject property, minimizing glare and light spill into neighboring areas. Building-mounted and site lighting will be prioritized for pedestrian pathways and highly visible zones, including hotel entries, access points, and outdoor gathering spaces, providing both functional and aesthetic benefits. Architectural features of the building will be thoughtfully accented through integrated lighting approaches that emphasize material transitions, façade articulation, and key vertical elements, helping to define the building's character at night. Lighting solutions will be subtle yet intentional, contributing to the visual identity of the development without overwhelming the context. All lighting will be designed in accordance with the City of Napa's exterior lighting standards, incorporating energy-efficient sources, reduced light pollution strategies, and a clear emphasis on dark-sky principles. The result will be a lighting environment that supports the proposed project's architectural vision while contributing to a welcoming and responsible nighttime streetscape.

### 2.4.6 - Frontage Improvements

The proposed project would include approximately 0.66 acre of off-site roadway and sidewalk improvements along the portions of Second Street, Randolph Street, and Franklin Street that are adjacent to the project site. These improvements would include reconstruction of sidewalks, construction of and ADA-curb ramps with truncated domes, development sidewalk bulb-outs, and re-striping of existing parallel parking spaces.

### 2.4.7 - Utilities

The proposed project would be served by the following utility providers:

- Electricity: Pacific Gas and Electric Company (PG&E)
- Potable Water: City of Napa Water Division
- Wastewater: Napa Sanitation District
- Storm Drain: City of Napa
- Solid Waste/Recycling: Napa Recycling and Waste Services (NRWS)
- Telecommunications: AT&T and/or Verizon

The proposed project would connect to existing underground water, storm drainage, sanitary sewer, and telecommunications infrastructure beneath Franklin Street, Second Street, and Randolph Street. No other new infrastructure or extensions are proposed.

### **2.4.8 - Storm Drainage**

The proposed project would be divided into three drainage management areas (DMAs) to direct stormwater runoff. DMAs 1 and 2 would service the proposed hotel, while DMA 3 would service the proposed mixed-use structure. Each DMA would direct runoff into draining tree boxes which would connect to a storm drain system that would ultimately feed into the existing storm drain facilities beneath Franklin Street and Randolph Street.

### **2.4.9 - Phasing and Construction**

Construction of the proposed project and off-site roadway and frontage improvements is estimated to be completed in one phase that is projected to last 28 months, with demolition beginning in April of 2027 and construction ending in August of 2029. The proposed project is expected to be operational in November of 2029.

While construction of the proposed project is anticipated to occur as a single phase as described above, the applicant may elect to undertake an initial phase consisting of constructing the hotel and accessory amenities associated consistent with the Preservation Covenant. This initial phase would involve historic rehabilitation and related improvements consistent with applicable zoning regulations and historic preservation requirements and would allow for timely protection of the historic structure from potential natural disasters. Implementation of such an initial rehabilitation phase would not alter the overall project description or the timing, scope, or intensity of the full project analyzed in this Addendum, and the hotel and mixed-use components would be constructed subsequently as part of the overall project buildout.

## **2.5 - Discretionary Approvals**

The proposed project conforms to the DNSP Land Use and Zoning designations. It is anticipated that the proposed project would require the following discretionary approvals:

- Planned Development Overlay PD-37 Amendments
- Development Agreement
- Certificate of Appropriateness
- Major Design Review Approval
- Tentative Parcel Map

### 3 - CEQA CHECKLIST

The purpose of the checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the Final EIR. These environmental categories might be answered with a “no” in the checklist, since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This Addendum addresses the conclusions of the DNSP EIR as well as provides a comparative discussion and analysis relative to the 2018 Addendum for each environmental category.

#### 3.1 - Explanation of Checklist Evaluation Categories

##### (1) Conclusion in DNSP EIR and Related Documents

This column summarizes the conclusion of the previous EIR relative to the environmental issue listed under each topic.

##### (2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162 (a)(1), this column indicates whether the changes represented by the revised project will result in new significant environmental impacts not previously identified or mitigated by the previous EIR or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

##### (3) New Circumstances Involving New Impacts?

Pursuant to CEQA Guidelines Section 15162 (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the project is undertaken that will require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

##### (4) New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162 (a)(3)(A-D), this column indicates whether new information of substantial importance, which was not known and could not have been known

with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or ND;
- (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.

If the additional analysis completed as part of this environmental review were to find that the conclusions of the previous EIR remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered “no” and no additional environmental document would be required.

## **(5) Mitigation Measures Implemented to Address Impacts**

Pursuant to CEQA Guidelines Section 15162 (a)(3), this column indicates whether the previous EIR provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. The response will also address proposed revisions to previously adopted mitigation measures. These mitigation measures will be implemented with the construction of the project, as applicable. If “NA” is indicated, the Final EIR has concluded that the impact either does not occur with this project or is not significant, and therefore no additional mitigation measures are needed.

## **3.2 - Discussion and Mitigation Sections**

The following sections include three components for each environmental checklist question: discussion of each checklist question and any potential impacts to the environment, any mitigation measures required, and a conclusion of the analysis. Each component is further described below:

### **(1) Discussion**

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

## (2) Mitigation Measures

Applicable mitigation measures from the previous EIR that apply to the proposed project are listed under each environmental category.

## (3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

## 3.3 - Environmental Topics

The following topics are evaluated in accordance with current CEQA Guidelines and requirements:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- GHG Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

**THIS PAGE INTENTIONALLY LEFT BLANK**

| Environmental Issue Area                                                                                                                                                                                                                                                                                                                          | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>I. Aesthetics, Light, and Glare</b><br><i>Except as provided in Public Resources Code Section 21099, would the project:</i>                                                                                                                                                                                                                    |                              |                                                             |                                                         |                                                         |                                |
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                           | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?                                                                                                                                                                                           | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |



| Environmental Issue Area                                                                                              | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| governing scenic quality?                                                                                             |                              |                                                             |                                                         |                                                         |                                |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Scenic Vista

**Would the project: Have a substantial adverse effect on a scenic vista?**

#### **Summary of DNSP EIR Findings**

The DNSP EIR did not identify any significant impacts related to scenic views or vistas as a result of DNSP implementation. The DNSP EIR noted that the City of Napa does not have any officially designated scenic views or vistas but that views of the hills from the Oxbow area and views along the Napa Creek Corridor are view corridors that could potentially be affected by DNSP implementation, as well as short- and medium-range views from inside the DNSP area.

The Building Form Standards prescribe a maximum building height of 75 feet in the Downtown I Zone, a maximum building height of 60 feet in the Downtown II Zone, and a maximum height of 35 feet in the Transitional zone, with certain special design features that may extend beyond the height limit. The Design Guidelines contained in the DNSP require that new development not overwhelm the existing pedestrian experience of the street and that massing elements be incorporated into the future projects to appropriately transition between the structures of different heights.

The 2020 General Plan, which was the active General Plan at the time the DNSP EIR was published, contains two goals related to scenic resources with associated policies: (1) Goal LU-6—To improve the vitality and character of Downtown through planning, design, business-community partnerships, and City programs and projects that encourage a variety of social, entertainment, cultural, retail, administrative, and government uses; and (2) Goal HR-4—To achieve a vital Downtown that reflects its historic urban form and setting, offering a mix of old and new buildings. (Since the adoption of the

DNSP, the City adopted its 2040 General Plan Update, which contains the following updated goals related to scenic resources: Goal LUCD-2, Goal LUCD-5, Goal LUCD-10, Goal LUCD-11, etc.).

The DNSP EIR determined that buildout of the DNSP would be consistent with the goals and policies in the 2020 General Plan related to scenic resources, which mainly focus on the scenic value of the built environment rather than natural scenic views. The DNSP EIR concluded that compliance with the provisions of the DNSP would ensure that impacts to view corridors and short- and medium-range views from inside the DNSP area are reduced to a less than significant level.

The 2040 General Plan EIR evaluated the 2040 General Plan Update policies promoting, supporting, and facilitating further development in Downtown Napa in furtherance of the DNSP and recognized the DNSP as the guiding framework for development in Downtown. The 2040 General Plan Update did not alter the analysis of scenic resources evaluated in the DNSP EIR.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts related to scenic vistas; however, it incorporated additional explanation regarding the implementation of the Design Guidelines for the Franklin Station Hotel to ensure clarity and enforceability. These were project-specific design guidelines intended to be additive to the standards and guidelines contained in the DNSP, including the Historic Design Guidelines, and to the site-specific guidelines developed for the Franklin Station Hotel and parking structure.

### ***Proposed Project Analysis and Conclusions***

Consistent with the existing setting established in the DNSP EIR and the 2018 Addendum, the project site is located in an urban area with existing development that obstructs views of surrounding areas. Scenic resources in the area around the project site include Napa River and the Oxbow area, hillsides to the northeast of the project site, as well as the many historic buildings scattered throughout Downtown, such as the Franklin Station Post Office building. Existing development to the north and east of the project site currently blocks views of Napa River, the Oxbow area, and the hillsides.

While the project site is located in the Downtown II Zone, the proposed project would be developed pursuant to a PD-37 Overlay establishing use provisions and development standards for the property including the adoption of site-specific Design Guidelines. The PD-37 Overlay includes height allowances up to 75 feet for rooftop patios with food and bar service, including restrooms and food and bar service structures, provided that such features are accessory to the main use of the site and are setback to minimize visibility from the street.

The proposed project intends to restore the historic frontage of the Franklin Station Post Office building by retaining the significant historic features outlined in the application for the project's Certificate of Appropriateness, including the ornamental cornice along the roofline, the bronze and milk glass urn-shaped light fixtures adjacent to the entryways, and monolithic windows, among others. Approximately 4,650 square feet of the building is to be retained and restored, while the rear of the building would be demolished and developed with the proposed hotel structure. The proposed hotel structure would be 75 feet or less in height.

Views of the historic frontage of the Franklin Station Post Office building would remain unchanged from 2nd Street. The building is currently visible from Franklin Street and Randolph Street, and redevelopment of the rear portion of the building would not affect views of the historic frontage of the Franklin Station Post Office building from Franklin Street and Randolph Street. Views of the Franklin Station Post Office building from Coombs Street are currently blocked by existing development. As such, development of the mixed-use portion of the proposed project on the southeast corner of 2nd Street and Randolph Street would not affect views of the Franklin Station Post Office building from Coombs Street. Therefore, the proposed project would not result in any new or more severe impacts with respect to scenic vistas that were not previously analyzed and disclosed in the DNSP EIR and no further environmental analysis is required. As such, development of the proposed project also would have a less than significant effect on existing views of scenic resources in the area.

**b) State Scenic Highways**

**Would the project: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?**

***Summary of DNSP EIR Findings***

The DNSP EIR states that there are currently no officially designated State scenic highways within the DNSP Planning Area. Additionally, the DNSP EIR determined that there are no rock outcroppings in the DNSP Planning Area, and the majority of the visual resources in the area include historic buildings, contemporary structures, and natural features along the Napa River and Napa Creek. Design Guidelines developed as part of the DNSP guide future building design within the Planning Area, requiring that new buildings be sensitive to the historic scale and architecture of Downtown and encourage historic preservation. Furthermore, while some mature street trees may be removed as part of the implementation of the DNSP, the DNSP encourages the addition of trees and landscaping along sidewalks, as well as in plazas and other public spaces. Therefore, the DNSP EIR concluded that impacts to scenic resources would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts on scenic highways; however, it incorporated additional explanation regarding the implementation of the Design Guidelines for the Franklin Station Hotel to ensure clarity and enforceability.

***Proposed Project Analysis and Conclusions***

The nearest officially designated State Scenic Highway is a portion of SR-12, located more than 12 miles to the northwest of the project site.<sup>15</sup> The City's General Plan designates part of Silverado Trail (SR-121) from Imola Avenue to Lincoln Avenue as a scenic corridor, which is just east of the DNSP Planning Area. However, the project site is not visible from SR-121 due to intervening development

---

<sup>15</sup> California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed November 13, 2025.

and vegetation. The proposed project also would not remove or damage any existing scenic resources in the area, such as Napa River. The proposed project would restore and maintain the historic frontage of the Franklin Station Post Office building while removing the rear portion of the building. However, the rear portion of the building does not contain any of the significant historic features identified for preservation in the Certificate of Appropriateness, therefore, the proposed alterations to the Franklin Station Post Office building would not constitute the removal or damage of an existing scenic resource.

The DNSP contains policies and actions that require new buildings to be sensitive to the scale and architecture of existing historic buildings. The proposed project would also comply with Items 9 and 10 of the Secretary of Interior Standards for Treatment of Historic Properties and would include design elements that would extend the visual character of the Franklin Station Post Office building along the new development's street frontage. The proposed project would preserve views of the historic Franklin Station Post Office building from surrounding roads and would be required to make design refinements if needed to ensure that its architecture would be compatible with the Franklin Station Post Office building. Therefore, the proposed project would not result in any new or more severe impacts with respect to State scenic highways that were not previously analyzed and disclosed in the DNSP EIR and no further environmental analysis is required. As such, the proposed project's effects on scenic resources related to scenic highways also would be less than significant.

### **c) Visual Character**

**Would the project:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

#### ***Summary of DNSP EIR Findings***

In evaluating this impact, the DNSP EIR evaluated both the potential effect on the existing visual character and consistency with the General Plan. The DNSP EIR recognized that development under the DNSP would result in changes to the visual character of the DNSP area and evaluated those changes in the context of community objectives as outlined in the General Plan and the DNSP. The DNSP acknowledges the need to address the community's desire for a more active and vibrant Downtown, and it proposes to provide opportunities to introduce a variety of infill projects, new community public spaces, and new residential uses while modulating the design of the new development to be sensitive to the existing small-town character. The DNSP includes various mechanisms to guide implementation of this overall vision, including Development Standards for Building Form Districts, Design Guidelines to Address the Built Form, Design Guidelines for the Town Center Focus Area, Design Guidelines to Address Historic Resources, and Design Guidelines to Address the Public Realm.

These mechanisms respond to the General Plan goal of improving the vitality and character of Downtown through planning and design. The DNSP EIR determined that proposed building heights would channel more intense development to the Downtown core, creating a focal point with a strong civic presence within that area while transitioning to lower heights consistent with the existing character and lower development intensities of surrounding areas. Further, the DNSP EIR found that DNSP Design Guidelines would require varied massing for visual interest; setbacks to ensure consistency with existing historic structures; and street trees and pedestrian amenities to enliven the public realm and create a continual visual theme along streets Downtown. The DNSP EIR concluded that, while DNSP implementation would lead to changes from the existing visual character, such changes would not result in adverse visual impacts and could even potentially result in a beneficial impact. Overall, the DNSP EIR found that impacts to visual character would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts on visual character; however, it incorporated additional explanation regarding the implementation of the Design Guidelines for the Franklin Station Hotel to ensure clarity and enforceability.

### ***Proposed Project Analysis and Conclusions***

The project site falls under the PD-37 Overlay, which adopts the Downtown II Building Form Zone standards, to create consistent height and density standards on the project site. The proposed project would generally conform to the building standards of the Downtown II Building Form Zone as contained in the PD-37 Overlay and project-specific Design Guidelines. However, the proposed project would include amendments to the PD-37 Overlay to allow an exceedance of the maximum permitted height of 60 feet under the Downtown II Building Form Zone. This would include a height exceedance up to 75 feet for mixed-use and hotel structures where the top floor is setback to minimize visibility from the street.

Development of the proposed project would include restoring the historic frontage of the Franklin Station Post Office building, as described above, and demolishing the rear portion of the building to develop the proposed hotel structure, which would include a setback design to ensure upper balconies and rooftop common areas are not visible from the street. Additionally, the proposed project would include design elements which would extend the visual character of the Franklin Station Post Office building along the new development's street frontage, including the portion at the southeast corner of 2nd Street and Randolph Street. As such, the proposed project would be consistent with the visual character of the area and the goals outlined for the Downtown II Building Form Zone.

The PD-37 Overlay establishes the Franklin Station Hotel Design Guidelines, which supersede the DNSP Design Guidelines, Chapter 5. The project-specific guidelines are intended to establish the framework for a comprehensive program that addresses both the historic preservation elements along with commercial building elements that will revitalize Downtown Napa into a vibrant place for both visitors and residents. The project-specific guidelines are contained in Appendix C. Moreover, while the DNSP Design Guidelines are superseded by the PD-37 Overlay, the proposed project would include the planting of street trees along the project site frontage, consistent with the intent behind the

street tree design guidelines of the DNSP. With conformance to design guidelines, the proposed project would be consistent with the existing visual character and would not conflict with applicable zoning and other regulations governing scenic quality. Thus, the proposed project would not result in any new or more severe impacts with respect to visual character that were not previously analyzed and disclosed in the DNSP EIR and no further environmental analysis is required. Therefore, the proposed project's effects on visual character also would be less than significant.

**d) Light or Glare**

**Would the project: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

***Summary of DNSP EIR Findings***

The DNSP EIR concluded that the buildout of the DNSP would result in new sources of nighttime lighting and/or daytime glare. The DNSP EIR analyzed the following DNSP guidelines that would 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; recommend translucent or optical lens diffuser globes or shields; and balance the need to provide illumination and security with the desire to maintain the ambience of Downtown and minimize light pollution. According to the DNSP EIR these guidelines would reduce the effects of light and glare from the DNSP buildout to less than significant levels.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the light and glare analysis presented in the DNSP EIR, and the conclusions regarding light and glare impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The lighting design for the proposed project aims to enhance the property's architectural identity while supporting a safe, pedestrian-oriented environment that aligns with the City of Napa's lighting regulations. All exterior lighting would be shielded and directed to ensure illumination is confined to the proposed development, minimizing glare and light spill into neighboring areas. Building-mounted and site lighting would be prioritized for pedestrian pathways and highly visible zones, including hotel entries, access points, and outdoor gathering spaces, providing both functional and aesthetic benefits. Architectural features of the building would be illuminated with shielded lighting directed at the desired features, in order to avoid light spillage and glare. All lighting would be designed in accordance with the City of Napa's exterior lighting standards, incorporating energy-efficient sources, reduced light pollution strategies, and a clear emphasis on dark-sky principles. Therefore, the proposed project would not result in any new or more severe impacts with respect to light or glare that were not previously analyzed and disclosed in the DNSP EIR and no further environmental analysis is required. As such, the proposed project's effects on lighting and glare also would be less than significant.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Aesthetics, Light, and Glare, the proposed project would not result in a new significant source of light or glare that adversely impacts views that was not previously evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant aesthetics impact. There is no new information of substantial importance related to aesthetics impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.



| Environmental Issue Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>II. Agriculture and Forestry Resources</b><br><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i> |                        |                                                             |                                                         |                                                         |                                |
| 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 nonagricultural use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| c) Conflict with existing zoning for, or cause rezoning of, forest                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | No impact              | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                                                | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| 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) Result in the loss of forest land or conversion of forest land to non-forest use?                                                                                                                                    | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?             | No impact              | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### **a-e) Conversion of Important Farmland, Agricultural Zoning and Williamson Act Contracts, Forest Zoning, Conversion of Forest Land, Pressures to Convert Farmland or Forest Land**

- 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 nonagricultural use?**
  - b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**
  - c) Conflict with existing zoning for forest land 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 nonagricultural use or conversion of forest land to non-forest use?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR found no impacts with respect to agricultural or forest resources. Agricultural resources were discussed in DNSP EIR Chapter 6, Impact Overview and Growth Inducement, under Section 6.E, Effects Found not to be Significant. The DNSP area, including the Master Plan area, is developed with urban uses and is classified as urban and built-up land by the California Department of Conservation.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the agriculture and forestry resources analysis presented in the DNSP EIR, and the conclusions regarding agriculture and forestry resources impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

According to Department of Conservation's Important Farmland Finder, the area in and around the project site is designated as Urban and Built Up Land that is currently developed with the Franklin Station Post Office building and parking lots. As previously disclosed in the DNSP EIR, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Additionally, the project site is not under a current Williamson Act Contract, zoned for agriculture, or zoned for forestry uses. There are no forestry lands on the project site. As such, no impacts would occur. Therefore, the proposed project would not result in any significant effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Agriculture and Forestry Resources, the proposed project would not result in new significant agriculture and forestry resources impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant agriculture and forestry resources impact. There is no new information of substantial importance related to agriculture and forestry resources impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                                                                                                           | DNSP EIR Determination             | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|----------------------------------------------|
| <b>III. Air Quality</b><br><i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i><br><i>Would the project:</i> |                                    |                                                             |                                                         |                                                         |                                              |
| a) Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                                                                                    | Significant and unavoidable impact | No                                                          | No                                                      | No                                                      | MM 4.B-1<br>MM 4.B-2<br>MM 4.B-4<br>MM 4.B-5 |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?                                                                   | Significant and unavoidable impact | No                                                          | No                                                      | No                                                      | MM 4B-1 and<br>MM 4.B-2                      |
| c) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                                                             | Less than significant impact       | No                                                          | No                                                      | No                                                      | MM 4.B-2                                     |
| d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?                                                                                                                                               | Less than significant impact       | No                                                          | No                                                      | No                                                      | None                                         |

## Discussion

### a) Air Quality Plan Conflict

**Would the project: Conflict with or obstruct implementation of the applicable air quality plan?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR identified a significant and unavoidable impact with respect to implementation of the Specific Plan and implementation of the Bay Area 2010 Clean Air Plan, the most recent air quality plan in effect at the time the document was published, since the DNSP would exceed the population projections in the Clean Air Plan. The DNSP EIR implemented Mitigation Measures (MM) 4.B-1, which would ensure consistency with the Clean Air Plan TCM to promote clean, fuel efficient and zero-emission vehicles; MM 4.B-2 which would require construction and building design standards—such as limiting diesel idling, using cleaner engines, conducting HRAs, and incorporating high-efficiency filtration and siting buffers—to minimize sensitive receptor exposure to toxic air contaminants; MM 4.B-3 which would require project applicants to evaluate potential odor-generating land uses, apply appropriate siting buffers, and install odor-control equipment as needed to ensure sensitive receptors are not exposed to objectionable odors during development; MM 4.B-4 which would ensure continued implementation of MM 4.B-1 so that projects remain consistent with Bay Area Air District TCM promoting clean and zero-emission vehicles and MM 4.B-5 which would require project applicants to incorporate the City's Green Building and Development Measures and demonstrate that operational GHG emissions are reduced by 30 percent below business-as-usual levels to meet the City's 2020 reduction target.

However, even with mitigation, growth produced by the DNSP would produce a rate of increase in Vehicle Miles Traveled (VMT) that would be more than the rate of increase in population for the DNSP and would be considered inconsistent with the population and VMT assumptions of the Clean Air Plan. As such, the DNSP EIR identified a significant and unavoidable impact related to consistency with the Clean Air Plan.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of air quality plan consistency impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

#### ***Proposed Project Analysis and Conclusions***

Construction and operational activities for the proposed project would generate criteria pollutant emissions. Construction emissions would be temporary, would not impact any long-term air quality improvement plans or policies and would not interfere with the goals and policies of the most recently adopted 2017 Clean Air Plan for ozone compliance. The proposed project would incorporate MM 4.B-1, MM 4.B-2, MM B-4, and MM 4.B-5, to reduce overall emissions and demonstrate consistency with the Clean Air Plan. MM 4.B-3 would not be applicable to the proposed project because the proposed project does not include any uses that may produce objectionable odors but would be required to

implement all development standards and design guidelines in the DNSP. In particular, MM B-4 requires implementation of MM 4.B-1 to ensure consistency with the Clean Air Plan TCM. The proposed project would comply with all applicable control measures outlined in the 2017 Clean Air Plan. These control measures and their consistency with the proposed project are shown below in Table 4. Impacts relating to conflicts with an applicable air quality plan would therefore be less than significant.

**Table 4: Bay Area 2017 Clean Air Plan Applicable Control Measures**

| Control Measures                             | Description                                                                                                                                                                                                                                                                                                | Project Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Transportation Control Measures</b>       |                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Trip Reduction Programs                      | Encourage trip reduction policies and programs in local plans, e.g., general and specific plans. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. | <b>Consistent:</b> The proposed project would include features that support bicycle access as part of its commitment to sustainable transportation and mobility options. The proposed project would be required to comply with City and State requirements for the minimum number of bike stalls. In addition, pedestrians would access the project site from renovated sidewalks along Franklin Street, Second Street and Randolph Street that would connect to existing pedestrian facilities along these roadways. The proposed project, therefore, would be consistent with this measure. |
| Bicycle and Pedestrian Access and Facilities | Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.                                                                                                                                  | <b>Consistent:</b> The proposed project would include features that support bicycle access as part of its commitment to sustainable transportation and mobility options. The proposed project would be required to comply with City and State requirements for the minimum number of bike stalls, consistent with the assumptions under the DNSP EIR. While the developer is not voluntarily committing to additional bicycle facilities, such an evaluation will occur based on the needs and desires of any future hotel operating partner. In addition,                                    |



| Control Measures                         | Description                                                                                                                                                                                                                                                                                                              | Project Consistency                                                                                                                                                                                                                                                                                        |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          |                                                                                                                                                                                                                                                                                                                          | pedestrians would access the project site from renovated sidewalks along Franklin Street, Second Street and Randolph Street that would connect to existing pedestrian facilities along these roadways. The proposed project, therefore, would be consistent with this measure.                             |
| <b>Building Control Measures</b>         |                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                            |
| Green Building                           | Identify barriers to effective local implementation of the CALGreen (Title 24) Statewide building energy code; develop solutions to improve implementation/enforcement. Engage with additional partners to target reducing emissions from specific types of buildings.                                                   | <b>Consistent:</b> The proposed project would be built to comply with CALGreen Standards. The proposed project, therefore, would be consistent with this measure.                                                                                                                                          |
| Urban Heat Island Mitigation             | Develop and urge adoption of a model ordinance for “cool parking” that promotes the use of cool surface treatments for new parking facilities. Develop and promote adoption of model building code requirements for new construction or re-roofing/roofing upgrades for commercial and residential multi-family housing. | <b>Consistent:</b> The proposed project would be constructed to conform to the DNSP’s sustainability measures, High-Performance Building Ordinance, and the Citywide Sustainability Plan. The proposed project, therefore, would be consistent with this measure.                                          |
| <b>Waste Management Control Measures</b> |                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                            |
| Recycling and Waste Reduction            | Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.                                                                                                                               | <b>Consistent:</b> The proposed project would be required to comply with the City’s Construction and Demolition Debris Ordinance (Chapter 15.32), which would require that 50 percent of waste be diverted from landfill disposal. The proposed project, therefore, would be consistent with this measure. |
| <b>Water Control Measures</b>            |                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                            |
| Support Water Conservation               | Develop a list of best practices that reduce water consumption and increase on-site water recycling in                                                                                                                                                                                                                   | <b>Consistent:</b> The proposed project would comply with CALGreen and reduce outdoor water use by                                                                                                                                                                                                         |

| Control Measures | Description                                                           | Project Consistency                                                                                                        |
|------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
|                  | new and existing buildings; incorporate into local planning guidance. | planting drought-tolerant noninvasive landscaping. The proposed project, therefore, would be consistent with this measure. |

As shown above, the proposed project would result in less than significant impacts related to consistency with the Clean Air Plan. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

#### **b) Air Quality Standard, Criteria Pollutants**

**Would the project: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR conducted a programmatic-level analysis regarding the potential for a cumulative net increase of any criteria pollutant for which the project region is in nonattainment; to evaluate criteria pollutant emissions associated with the DNSP, the programmatic analysis evaluated whether the DNSP was consistent with the most recently adopted air quality plan for the Bay Area by following two metrics: (1) consistency with the so-called “control measures” contained in the current regional air quality plan; and (2) whether the projected rate of increase in VMT or vehicle trips would be less than or equal to projected population increase. The EIR analyzed the DNSP with the 2010 Bay Area Air District’s Transportation Control Measures (TCMs) and found that the DNSP was consistent with the 2010 Bay Area Air District’s TCMs with implementation of MM 4.B-1, which would ensure consistency with the Clean Air Plan Transportation Control Measures to promote clean, fuel efficient and zero-emission vehicles, and MM 4.B-2, which would require construction and building design standards—such as limiting diesel idling, using cleaner engines, conducting HRAs, and incorporating high-efficiency filtration and siting buffers—to minimize sensitive receptor exposure to toxic air contaminants. While implementation of MM 4.B-1 would ensure consistency with Bay Area Air District TCMs per Table 4.B-4 of the DNSP EIR, the rate of increase in VMT would be more than the rate of increase in population and, therefore, would be considered inconsistent with the population and VMT assumptions of the Clean Air Plan. Therefore, the DNSP was found to result in a cumulatively considerable criteria air pollutant impact.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of criteria pollutant impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

### ***Proposed Project Analysis and Conclusions***

The following analysis assesses the criteria air pollutants for which the project region, the San Francisco Bay Area Air Basin, is in nonattainment. The criteria air pollutants analyzed are ozone (e.g., precursor emissions NO<sub>x</sub> and ROG), and particulate matter (both PM<sub>10</sub> and PM<sub>2.5</sub>) emissions associated with the proposed project.

#### ***Construction***

The proposed project consists of a mixed-use development in accordance with the provisions of the DNSP. Construction is anticipated to occur in a single phase, with work to occur simultaneously on the hotel and mixed-use components of the proposed project. In the alternative, the applicant may elect to undertake an initial phase consisting of construction of the hotel and accessory amenities prior to the construction of the mixed-use development. Construction activities, particularly during site preparation and grading, would temporarily generate criteria pollutants. Sources of criteria pollutants would include disturbed soil at the construction site and trucks carrying uncovered loads of soils, as well as exhaust emissions from construction equipment. The proposed project would implement MM 4.B-2, which requires the use of construction equipment utilizing new diesel equipment to minimize diesel particulate matter (DPM) emissions during construction; accordingly, the construction contractor for the proposed project would utilize Tier 3 and/or Tier 4 equipment as is reasonably possible. All subcontractor bid documents would be required to comply with 2009 or newer diesel and/or gasoline vehicular engines for deliveries and on-site work (i.e. earthmoving activities). All subcontractors would be required to maintain current maintenance records and permits of all equipment, vehicles, and generators used on site, and these documents are auditable at any time during the construction phase. Contractors would also be required to minimize idling time of parked vehicles, generators, and handheld equipment to help minimize exhaust. The proposed project would also include salvage or reuse of materials of the historic Franklin Station Post Office building in coordination with the Napa County Landmarks, including potential repurposing of the materials which would help to decrease haul trips and construction materials.

In addition, the proposed project would also be required to employ Bay Area Air District Best Management Practices (BMPs) to control dust and exhaust, which have been supplemented since the DNSP went into effect. These BMPs are listed below:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).
7. Clear signage shall be provided for construction workers at all access points.
8. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
9. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Implementation of the measures recommended by the Bay Area Air District, as well as MM 4.B-2, with the additional clarifying language in Part 3 for projects developed under the Specific Plan that result in phased implementation, would reduce the criteria air pollutant emissions associated with grading and new construction. In addition, as discussed below, a screening-level assessment was conducted using Bay Area Air District-provided screening tools, and the screening evaluation concluded that the proposed project would fall below screening levels for construction (and operation, as discussed further below). Therefore, the proposed project would not result in a considerable net increase of any criteria pollutant for which the project region is in nonattainment during construction, and impacts would be less than significant.

### *Operation*

Following proposed project construction, long-term operational emissions would be generated from daily operations. Operational emissions would include area and mobile sources. Area sources would include emissions from architectural coatings, consumer products, landscape equipment, and the combustion of natural gas for water heaters and other heat sources. Mobile sources would include exhaust and road dust emissions from the automobiles that would travel to and from the project site. The proposed project is not anticipated to include stationary sources. However, if implemented, any stationary sources, such as emergency diesel generators, would operate intermittently and only for testing and emergency conditions, and would be subject to stringent permitting requirements imposed by the Bay Area Air District, which would limit and control emissions to less than significant levels.

To evaluate potential impacts from area and mobile source emissions, the Bay Area Air District developed screening criteria for criteria air pollutants and precursors. These screening criteria provide lead agencies with a conservative indication of whether implementing a proposed project could result in potentially significant criteria air pollutants and precursor impacts during project construction or operation. If all screening criteria for criteria air pollutants and precursors are met by a proposed project, then the Lead Agency does not need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions, and impacts would be presumed to be less than significant.

The Bay Area Air District provides a Mixed Land Use Screening Tool for Criteria Pollutants and Precursors when a project is associated with multiple land use types; the tool estimates whether the proposed project may exceed construction thresholds or operational thresholds, and whether further analysis is needed before making a significance determination. The proposed project's potential impacts were evaluated using the Bay Area Air District Mixed Use Screening Tool for Criteria Pollutants and Precursors and included the project characteristics as defined under Sections 1.1 and 2.4. Modeling details, including the model output, is available in Appendix D. The screening evaluation indicated that the proposed project would fall below construction and operational screening, and no further analysis is required. Thus, the proposed project meets the operational screening criteria established by Bay Area Air District and impacts would be less than significant.

Therefore, the proposed project would not result in a considerable net increase of any criteria pollutant for which the project region is in nonattainment during operation and impacts would be less than significant.

#### *Summary*

Accordingly, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact during proposed project construction or operation that was not previously identified in the DNSP EIR.

#### **c) Sensitive Receptors**

**Would the project: Expose sensitive receptors to substantial pollutant concentrations?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR identified a less than significant impact related to sensitive receptors. Toxic air contaminant (TAC) emissions from construction activities under the DNSP would be related to DPM emissions from heavy equipment operations during grading, excavation, building construction, and transportation activities. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Existing and new residents would be occupying the site concurrently with on-site construction activities. Short-term construction activities could therefore expose sensitive receptors to levels that exceed applicable standards because of the close proximity between on-site diesel equipment and residences. This impact was found to be potentially significant by the DNSP EIR.

As discussed previously, any land uses that would be developed under the DNSP that would include stationary sources that may emit TACs would be subject to Bay Area Air District permitting and Toxics Best Available Control Technology (T-BACT) requirements. The Bay Area Air District would assess such sources for potential health risk impacts based on their potential to emit TACs. If it is determined that the sources would emit TACs in excess of Bay Area Air District's applicable threshold of significance, T-BACT would be implemented to reduce emissions. If the implementation of T-BACT would not reduce the risk below the threshold, then the Bay Area Air District would deny the required

permit. As a result, the DNSP EIR determined that impacts associated with exposure of sensitive receptors to substantial toxic air emissions from stationary source operations would be less than significant.

On-site mobile sources of TAC emissions would primarily be associated with the operation of diesel-fueled delivery trucks associated with commercial land uses proposed under the DNSP. The California Air Resources Board (ARB) adopted an idling-restriction Airborne Toxic Control Measure (ATCM) for large commercial diesel-powered vehicles, which became effective February 1, 2005. In accordance with this measure, affected vehicles are required to limit idling to no longer than five minutes under most circumstances. Nonetheless, given that proposed on-site commercial land uses had not yet been identified and given the potential proximity of nearby sensitive receptors, exposure of nearby on-site receptors to mobile source TACs associated with commercial activities was considered a potentially significant impact by the DNSP EIR.

The DNSP EIR implemented MM 4.B-2, which requires that future development incorporate measures to reduce or avoid exposure of sensitive receptors to TACs. With this mitigation, as well as following Bay Area Air District Guidelines on sensitive receptors, the DNSP EIR identified that impacts related to exposing sensitive receptors to substantial pollutant concentrations would be reduced to less than significant levels.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts related to the exposure of sensitive receptors to substantial pollutant concentrations.

### ***Proposed Project Analysis and Conclusions***

#### ***Construction***

The proposed project would include the development of a hotel and restaurant/retail uses, which would result in construction-related emissions, as discussed above. The proposed project would be required to implement MM 4.B-2, which requires minimizing idling time, and using new diesel engines. As described above, the construction contractor for the proposed project would utilize Tier 3 and/or Tier 4 equipment as is reasonably possible. All subcontractor bid documents would be required to comply with 2009 or newer diesel and/or gasoline vehicular engines for deliveries and on-site work (i.e. earthmoving activities). All subcontractors would be required to maintain current maintenance records and permits of all equipment, vehicles, and generators used on site, and these documents are auditable at any time during the construction phase. Contractors would also be required to minimize idling time of parked vehicles, generators, and handheld equipment to help minimize exhaust. In addition, the proposed project would include salvage or reuse of materials of the historic Franklin Station Post Office building in coordination with the Napa County Landmarks, including potential repurposing of the materials which would help to decrease haul trips. In addition, the proposed project would also be required to employ Bay Area Air District BMPs to control dust and exhaust. Prior to approval of demolition permits or grading permits, the proposed project must demonstrate compliance with MM 4.B-2 by incorporating applicable specifications into construction plans and/or project design. Therefore, with implementation of MM 4.B-2, construction-related

impacts would not expose nearby sensitive receptors to substantial pollutant concentrations and impacts from construction would be less than significant.

### *Operation*

The proposed project would include the development of hotel and limited retail and restaurant uses and is not expected to generate substantive DPM or TAC emissions during operational activity. Operational emissions would primarily consist of passenger vehicle trips associated with hotel guests, residents, employees, and visitors. Emissions from passenger vehicles are not considered a source of project-level TACs, because TACs are associated with diesel-fueled engines and stationary or industrial sources rather than gasoline-powered light-duty vehicles. The proposed project does not include operational activities that would generate ongoing diesel truck traffic, such as distribution, warehousing, or industrial operations. The proposed project is not anticipated to have stationary sources during operation. However, as discussed previously, stationary sources such as diesel emergency generators would only operate intermittently for testing or emergency situations, and would be subject to Bay Area Air District permitting and T-BACT requirements. The Bay Area Air District would assess such sources for potential health risk impacts based on their potential to emit TACs during the permitting process and would require, T-BACT to be implemented to reduce emissions to less than significant levels. Accordingly, the project would not result in ongoing operational TAC emissions or expose sensitive receptors to substantial concentrations of TACs.

Because the proposed project would include residential receptors, an analysis was conducted pursuant to MM 4.B-2 to assess the potential impacts on new residences from existing sources of TACs within 1,000 feet. This analysis was conducted using the Bay Area Air District Screening tools.<sup>16</sup> Additional details and outputs from the screening tools are available in Appendix D.

Table 5 summarizes the potential health impacts to the new residential receptors from existing sources of TACs at the project site, including stationary sources, existing roadways and rail sources. As shown in Table 5, the cumulative health impacts to future on-site residences associated with the proposed project from existing TAC emissions sources are below the Bay Area Air District's cumulative thresholds for cancer risk, chronic hazards and PM<sub>2.5</sub> concentrations.

In addition, the California Building Code update in 2022 requires heating, ventilation and air conditioning (HVAC) systems with Minimum Efficiency Reporting Values (MERV-13) or better filtration in newly constructed multi-family homes, which serves to effectively mitigate the impacts of TACs and/or PM<sub>2.5</sub> for indoor exposure (which is consistent with requirements of MM 4.B-2). Therefore, MERV-13 filtration would serve to further reduce any potential health risks shown in Table 5, which are already below identified thresholds.

---

<sup>16</sup> Bay Area Air Quality Management District (Bay Area Air District). 2025. Health Risk Screening and Modeling. Website: <https://www.baaqmd.gov/en/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling>. Accessed December 22, 2025.

**Table 5: Cumulative Health Risks at the Project Site**

| Source                                                                                                                                                                                                                                                                                                                                                                                                                       | Cancer Risk<br>(per million) | Chronic<br>HI | PM <sub>2.5</sub><br>Concentration<br>(mg/m <sup>3</sup> ) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|---------------|------------------------------------------------------------|
| <b>Cumulative Health Risks at Project Site</b>                                                                                                                                                                                                                                                                                                                                                                               |                              |               |                                                            |
| Stationary Sources (within 1,000 feet)                                                                                                                                                                                                                                                                                                                                                                                       | 14.0                         | 0             | 0.01                                                       |
| Mobile Sources (Roadways and Rail)                                                                                                                                                                                                                                                                                                                                                                                           | 21.06                        | 0.04          | 0.29                                                       |
| <b>Cumulative Health Risks at Project Site</b>                                                                                                                                                                                                                                                                                                                                                                               | <b>35.06</b>                 | <b>0.04</b>   | <b>0.30</b>                                                |
| <b>Bay Area Air District's Cumulative<br/>Thresholds of Significance</b>                                                                                                                                                                                                                                                                                                                                                     | <b>100</b>                   | <b>100</b>    | <b>0.8</b>                                                 |
| <b>Threshold Exceeded?</b>                                                                                                                                                                                                                                                                                                                                                                                                   | <b>No</b>                    | <b>No</b>     | <b>No</b>                                                  |
| Notes:<br>Bay Area Air District = Bay Area Air Quality Management District<br>DPM = diesel particulate matter<br>HI = hazard index<br>PM <sub>2.5</sub> = particulate matter, including dust, 2.5 micrometers or less in diameter<br>mg/m <sup>3</sup> = micrograms per cubic meter<br>The health risks and concentrations from railway, roadway, and stationary sources are based on Bay Area Air District screening tools. |                              |               |                                                            |

Therefore, the proposed project would be consistent with the requirements of MM 4.B-2, and no additional action would be required. Thus, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation, nor would it result in significant health impacts to new residential receptors upon project buildout, and impacts would be less than significant.

### Summary

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects to expose sensitive receptors to substantial pollutant concentrations during project construction or operation and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.



**d) Odors**

**Would the project:      Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?**

***Summary of DNSP EIR Findings***

The DNSP EIR identified a less than significant impact related to odors. According to the DNSP EIR, typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. The DNSP does not include the development of these types of facilities. However, commercial development could provide uses that may include sources of odorous emissions (e.g., food service) that could be perceived as offensive to some individuals. Regarding land use compatibility of locating new sensitive receptors, there are no substantial existing sources of odor identified in the vicinity of the DNSP. In certifying the DNSP EIR, the City required the implementation of MM 4.B-3, which would require DNSP Design Guidelines and development standards, to include measures to reduce or avoid exposure of sensitive receptors to odors during development under the DNSP. As such, the DNSP EIR identified a less than significant impact.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts related other emissions (such as those leading to odors); however, it incorporated additional explanation regarding the implementation of MM 4.B-3 to reduce any potential impact related to odors from the proposed commercial food service uses through ventilation and to ensure clarity and enforceability.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project includes a mixed-use development that would consist of retail and hotel uses.

Odor impacts could occur if the proposed project introduces a new odor source near existing receptors. Since preparation of the 2018 Addendum, the Bay Area Air District has adopted the updated 2022 CEQA Guidelines.<sup>17</sup> In these guidelines, the Bay Area Air District provides a list of specific odor-generating facilities. According to the Bay Area Air District, residential, hotel, retail, and commercial food service uses are not considered substantial odor-generating facilities.<sup>18</sup>

---

<sup>17</sup> Bay Area Air Quality Management District (Bay Area Air District). CEQA Thresholds and Guidelines Update. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed April 2, 2026.

<sup>18</sup> Bay Area Air Quality Management District (Bay Area Air District). Project-Level Air Quality Impacts. Website: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts\\_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc\\_lang=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en). Accessed April 2, 2026.

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

The proposed project does not include any uses that may produce objectionable odors but would be required to implement all development standards and design guidelines in the DNSP. As such, impacts related to objectionable odors would be less than significant.

Therefore, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse emissions impact affecting a substantial number of people that was not previously identified in the DNSP EIR.

## Relevant DNSP EIR Mitigation Measures

The following mitigation measures from the DNSP would be required to be implemented by the proposed project. Note that the TCMs referenced in MM 4.B-1 are identified in Table 4.B-4 of the DNSP EIR. Additionally, please note that the requirements of Part 2 under MM 4.B-2 have been satisfied by the analysis contained within this Addendum, and no further action would be needed by the proposed project with respect to implementation of MM 4.B-2, Part 2.

- MM 4.B-1** In order to be consistent with the MSM A-1 and MSM A-2 Transportation Control Measures (TCMs), the City shall require that the following measures be included as potential Transportation Demand Management (TDM) strategies to be implemented by individual project applicants, where feasible and appropriate:
- Install charging units for electric vehicles at residences and businesses.
  - Develop incentives for businesses to include preferential parking for electric and/or hybrid vehicles. (As required by the 2010 California Green Building Standards Code, Chapter 5, Section 5.106.5.2).
- MM 4.B-2** The City shall ensure that the Specific Plan design guidelines and development standards incorporate the following measures to reduce or avoid exposure of sensitive receptors to TACs:
- Part 1 for construction activities, measures may include, but not limited to, the following:

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (as required by the State Airborne Toxics Control Measure [Title 13, Section 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site.
- Use new diesel engines that are designed to minimize DPM emissions (usually through the use of catalyzed particulate filters in the exhaust) or retrofitting older engines with catalyzed particulate filters which would reduce up to 85 percent of DPM emissions.

Part 2 for operational activities, in order to comply with the Air Quality and Land Use Handbook: A Community Health Perspective (ARB 2005) and achieve an acceptable interior air quality level for sensitive receptors, appropriate measures, shall be incorporated into residential building design. For projects to be developed under the Specific Plan that include residential receptors within 1,000 feet of a source of TACs (stationary or CNR railroad), the appropriate measures shall include one of the following methods:

1. The project applicant shall retain a qualified air quality consultant to prepare a Health Risk Assessment (HRA) in accordance with the ARB and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents to TACs prior to issuance of a demolition, grading, or building permit. The HRA shall be submitted to the Planning Division for review and approval. The applicant shall implement the approved HRA recommendations, if any. If the HRA concludes that the air quality risks from nearby sources are at or below acceptable levels, then additional measures are not required.
2. The project applicant shall implement the following features that have been found to reduce the air quality risk to sensitive receptors and shall be included in the project construction plans. These shall be submitted to the Planning Division and the Building Division for review and approval prior to the issuance of a demolition, grading, or building permit and ongoing.
  - a. Do not locate sensitive receptors near distribution center's entry and exit points.
  - b. Do not locate sensitive receptors in the same building as a perchloroethylene dry cleaning facility.
  - c. Maintain a 50' buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).
  - d. Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each individual residential unit that meets the efficiency standard of the MERV 13. The HV system shall include the following features: Installation of a high efficiency filter and/or carbon filter to filter particulates and other chemical

matter from entering the building. Either HEPA filters or ASHRAE 85 percent supply filters shall be used.

- e. Retain a qualified HV consultant or HERS rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources.
- f. Maintain positive pressure within the building.
- g. Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
- h. Achieve a performance standard of at least four air exchanges per hour of recirculation.
- i. Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.
- j. Project applicant shall maintain, repair and/or replace HV system or prepare an Operation and Maintenance Manual for the HV system and the filter. The manual shall include the operating instructions and maintenance and replacement schedule. This manual shall be included in the CC&Rs [Covenants, Conditions, and Restrictions] for residential projects and distributed to the building maintenance staff. In addition, the applicant shall prepare a separate Homeowners Manual. The manual shall contain the operating instructions and maintenance and replacement schedule for the HV system and the filters. It shall also include a disclosure to the buyers of the air quality analysis findings.

Part 3 for projects developed under the Specific Plan that result in phased implementation, whereby construction activities of one phase overlap with the operational activities of another phase and where no previous project-specific air quality analysis has been prepared, the following requirements shall apply:

1. Prior to issuance of any demolition, grading, or building permit for any project where the proposed phasing would create overlapping construction and operational conditions, the project applicant shall retain a qualified Air Quality Consultant to prepare a project specific air quality analysis to be submitted to the Planning Manager for review and approval.
  - a. The analysis shall quantify combined daily emissions (in pounds) from:
    - i. Peak construction activity of the subsequent phase (or phases); and
    - ii. Peak operational activity of any previously completed phase (or phases) that would be operating during construction.
  - b. The analysis shall utilize Bay Area Air District-accepted emissions models and methodologies (e.g., CalEEMod), evaluate the criteria air pollutants emissions identified above, and compare combined emissions against applicable Bay Area Air District significance thresholds.
  - c. The analysis shall demonstrate whether incorporation of measures, including but not limited to measures within Part 1 and Part 2, would reduce combined

emissions to below applicable Bay Area Air District thresholds. If exceedances remain after applying measures, the applicant shall implement all additional feasible measures (construction or operational) necessary to reduce emissions to a less-than-significant level. These measures shall be reviewed and approved by the Planning Manager within the Planning Division prior to permit issuance and implemented by the Applicant.

d. If, after implementation of all feasible mitigation, combined overlapping emissions cannot be reduced to below applicable Bay Area Air District significance thresholds, a permit shall not be issued.

**MM 4.B-4** Implement Mitigation Measure 4.B-1 to ensure consistency with the Bay Area Air District TCMs to promote clean, fuel efficient, and zero-emission vehicles.

**MM 4.B-5** The City shall ensure that applicant(s) for individual projects to be developed under the Specific Plan would incorporate Green Building and Development Measures as listed in Appendix C (AIR-2). Each increment of new development under the Specific Plan requiring a discretionary approval from the City (e.g., proposed tentative subdivision map, conditional use permit), would demonstrate that GHG emissions from operation would be reduced by 30 percent from business-as-usual 2020 emissions levels, in order to achieve 1990 levels by 2020.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Air Quality, the proposed project would not result in new significant air quality impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant air quality resources impact. There is no new information of substantial importance showing that significant air quality resources impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives. The additions to MM 4.B-2 clarify and refine the manner in which the previously adopted mitigation will be implemented for the proposed project but do not themselves create new significant effects, substantially increase the severity of previously identified effects, or otherwise trigger any of the conditions requiring further environmental review under CEQA Guidelines Section 15162.

| Environmental Issue Area                                                                                                                                                                                                                                                                                                      | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>IV. Biological Resources</b><br><i>Would the project:</i>                                                                                                                                                                                                                                                                  |                                                           |                                                             |                                                         |                                                         |                                |
| 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 or United States Fish and Wildlife Service? | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.C-1b, MM 4.C-1c           |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish                                                                                 | Less than significant impact                              | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                                                     | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| and Wildlife Service?                                                                                                                                                                                                        |                                                           |                                                             |                                                         |                                                         |                                |
| c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | Less than significant impact                              | No                                                          | No                                                      | No                                                      | None                           |
| 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 wildlife nursery sites?  | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.C-1b                      |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?                                                                                          | Less than significant impact                              | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                             | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Special-status Species

**Would the project:** 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 or United States Fish and Wildlife Service?

#### *Summary of DNSP EIR Findings*

While Downtown is surrounded by a developed urban environment and relatively few special-status species are present, the DNSP EIR evaluated the potential impacts to special-status species that could result from full buildout of the DNSP. The DNSP EIR identified special-status plant and animal species known to occur or to have the potential to occur in the DNSP area, including Mason's lilaeopsis, Central Valley Chinook salmon, Central Coast steelhead, Sacramento splittail, California red-legged frog, foothill yellow-legged frog, northwestern pond turtle, special-status birds, and special-status bats.

The DNSP EIR identified several General Plan policies that address potential impacts to special-status species, including Policy NR-1.7, aimed specifically at protecting significant species and groves or clusters of trees during the development process; Policy NR-2.1, which requires the City to maintain information about the location of endangered, threatened, and rare species; Policy NR-2.3, which requires the City to refer development proposals in sensitive areas to appropriate State and federal agencies for review and comment; Policy NR-2.4, which requires the City to ensure the



environmental review documents identify any feasible means of avoiding any net loss of habitat or habitat value for endangered, threatened, and rare species and their habitats; and Policy NR-4.7, which encourages projects to avoid covering creeks whenever possible.<sup>19, 20, 21, 22, 23</sup>

Additionally, in certifying the DNSP EIR the City required the implementation of mitigation measures to further address potential impacts to threatened, endangered, candidate, sensitive, or special-status species. These mitigation measures included MM 4.C-1a, which requires implementation of design guidelines and development standards to protect fish species; MM 4.C-1b, which requires pre-construction special-status avian surveys; and MM 4.C-1c, which requires coordination with appropriate federal and State agencies on the avoidance of active nests. The DNSP EIR concluded that compliance with the above listed General Plan policies and implementation of the recommended mitigation measures would reduce impacts to a less than significant level.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP EIR, and the conclusions regarding biological resources impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The project site is currently fully developed with an existing office complex, restaurants, and associated parking lot, as well as the former Franklin Station Post Office. According to the DNSP EIR and the information in Appendix E, several special-status wildlife species are known to occur or have the potential to occur within or adjacent to the DNSP area, such as: the Mason's lilaeopsis, Central Valley Chinook salmon, Central Coast steelhead, Sacramento splittail, California red-legged frog, foothill yellow-legged frog, northwestern pond turtle, special-status birds, and special-status bats. Because of the developed nature of the project site and lack of habitats that could support special-status species, it is unlikely that any of the special-status species identified in the Planning Area would have the potential to occur on the project site.

However, notwithstanding the unlikely presence of any special species or habitat, the proposed project would be required to comply with applicable mitigation measures adopted by the DNSP EIR

---

<sup>19</sup> Policy NR-1.7: During development review, the City shall endeavor to identify and protect significant species and groves or clusters of trees on project sites.

<sup>20</sup> Policy NR-2.1: The City shall maintain information about the location of endangered, threatened, and rare species.

<sup>21</sup> Policy NR-2.3: The City shall continue to refer development proposals in sensitive areas to State and federal wildlife agencies for review and comment.

<sup>22</sup> Policy NR-2.4: When acting as a project proponent or when reviewing proposals for private projects requiring discretionary review by the City, the City shall ensure that its environmental review documents identify any feasible means of avoiding any net loss of habitat or of habitat value for endangered, threatened, and rare species. When necessary or desirable, such avoidance can be achieved through off-site mitigation measures. As part of the environmental review, the City shall determine whether the Department of Fish and Game, in implementing the California Endangered Species Act, and/or the United States Fish and Wildlife Service in implementing the Federal Endangered Species Act, will likely require mitigation sufficient to avoid any net loss of habitat or of habitat value for such species. Where these agencies are likely to require such a level of mitigation, the City may formulate its own mitigation measures so as to minimize the extent to which those measures duplicate the efforts of these agencies.

<sup>23</sup> Policy NR-4.7: Encourage design of projects to avoid covering creeks and drainageways whenever possible.

for the purpose of protecting special-status species, including MM 4.C-1b and MM 4.C-1c. MM 4.C-1a does not apply to the proposed project as it concerns fish species, and the proposed project is not adjacent to any bodies of water.<sup>24</sup> As such, the proposed project would be required to implement project-specific design features to ensure unimpeded flow of water, conduct pre-construction special-status avian surveys, and avoid and protect any special-status bird nests identified in pre-construction surveys. No development in riparian areas would occur. The proposed project would also be required to comply with all General Plan policies and actions related to mitigating effects on special-status wildlife species, including Policies NR-1.7, NR-2.1, NR-2.3, NR-2.4, and NR-4.7. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. The effects of the proposed project on special-status wildlife species also would be less than significant.

#### **b) Riparian Habitat and Sensitive Natural Communities**

**Would the project: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS) and determined there to be a less than significant impact in this regard. The DNSP EIR identified that the Planning Area contains both stream and riparian habitat, notably Napa Creek and the Napa River, which flow through and adjacent to Downtown and may therefore be affected by implementation of the DNSP. The DNSP EIR determined that conformance to General Plan policies and actions related to riparian habitats and sensitive communities would reduce impacts to habitat areas and wildlife movement corridors to a less than significant level. As such, the DNSP EIR identified a less than significant impact related to riparian habitats or other sensitive natural communities.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP EIR, and the conclusions regarding biological resources impacts remain unchanged.

<sup>24</sup> MM 4.C-1a: The City shall ensure that the project-specific and Specific Plan design guidelines and development standards incorporate the following measures to reduce or avoid impacts to fish species: Avoid, reduce, or compensate for indirect impacts to fish species. For example, removal of riparian vegetation would require compensatory shade plantings; Design creek and river crossings so as to maintain connectivity and allow for unimpeded flow of water, and if at all possible avoid building piers or footings within the channel.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. Although the project site is fully developed, it is located approximately 0.22 mile from the Napa River, though the River is separated from the site by commercial development and roadways. Conformance to General Plan policies and actions (NR-1.1 through NR-1.8, NR-1.13, NR-4.1 through NR 4.7, and PR 6.3, which protect riparian habitats and enforce setbacks and the planting of native vegetation) related to riparian habitats and sensitive communities would reduce impacts to habitat areas and wildlife movement corridors to a less than significant level. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse riparian habitat or other sensitive natural community impact that was not previously identified in the DNSP EIR.

**c) Federally Protected Wetlands**

**Would the project:     Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would impact federally protected wetlands and determined there to be a less than significant impact in this regard. The DNSP EIR identified no federally protected wetlands within the Planning Area; however, Napa Creek and the Napa River both border or run through the Planning Area, and in-stream wetlands may occur in these waters. The DNSP EIR determined that the implementation of the DNSP EIR would be required to adhere to General Plan policies NR-1.1, NR-1.4, NR-1.5, NR-1.8, NR-1.13, NR-1.A, NR-1.D, NR-4.1 through NR 4.7, and PR-6.3, which relate to the protection of wetlands,

Napa Creek, and the Napa River, which would reduce impacts to wetlands, streams, or riparian habitat to a less than significant level.<sup>25, 26, 27, 28, 29, 30, 31, 32, 33</sup>

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP Final EIR, and the conclusions regarding biological resources impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site does not contain any federally protected wetlands; however, Napa River is located 0.22 mile west of the project site, though it is separated from the project site by commercial development. Further, no wetlands have been identified within or adjacent to the project site.<sup>34</sup> Regardless, the proposed project would be required to comply with all applicable General Plan policies NR-1.1, NR-1.4, NR-1.5, NR-1.8, NR-1.13, NR-1.A, NR-1.D, NR-4.1 through NR 4.7, and PR-6.3, which relate to the protection of the Napa River and its associated wetlands and would reduce potential impacts on wetland areas to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be

<sup>25</sup> Policy NR-1.1. This policy will help protect riparian habitat from incompatible urban uses/activities.

<sup>26</sup> Policy NR-1.4. Impacts from waterway improvement projects such as the public boat dock and all improvements within 100 feet of Napa Creek or Napa River will be reviewed by the City and effects on riparian and aquatic habitat shall be minimized, if not improved.

<sup>27</sup> Policy NR-1.5. Restoration and enhancement wetland, riparian, and fish habitats will be pursued by the City.

<sup>28</sup> Policy NR-1.8. The City shall provide controlled access points in designated areas to prevent unrestricted public access to riparian habitat on public lands.

<sup>29</sup> Policy NR-1.13. The City shall require that the composting and recycling of landscape maintenance debris be located so as to avoid impacts on wetland, riparian, and fish habitat.

<sup>30</sup> Policy NR-1.A. The City shall review and modify as necessary existing regulations for the conservation and management of marsh, wetland, riparian, wildlife and plant habitats to ensure consistency with the General Plan.

<sup>31</sup> Policy NR-1.D. The City shall investigate the possibility of an ordinance to establish a maximum watercraft speed to protect against bank erosion from wakes, and shall develop informational/instructional signage for watercraft users.

<sup>32</sup> Policy NR-4.1. The City shall support the maintenance and improvement of surface and ground water quality. Policy NR-4.2. The City shall support the maintenance and improvement of water quality in the Napa River. Policy NR-4.3. The City shall support the monitoring and assessment of the effects of dredging in the Napa River. Policy NR-4.4. The City shall adopt standards and regulations for the reduction and/or elimination of nonpoint sources of pollution. Policy NR-4.5. The City shall maintain and strengthen where feasible current efforts to eliminate point sources of pollution. Policy NR-4.6. The City shall cooperate with Napa County to maintain the current program to identify and remove leaking underground storage tanks. Policy NR-4.7. Encourage design of projects to avoid covering creeks and drainageways whenever possible.

<sup>33</sup> Policy PR-6.3. Trail development shall be consistent with protection and enhancement of wildlife habitats along the River. The City shall identify potential areas for habitat preservation and enhancement along the river during the preparation of trail design and development plans. The City shall design and locate the multiuse trail to minimize impacts to sensitive habitats and resources wherever possible.

<sup>34</sup> United States Fish and Wildlife Service (USFWS). 2026. National Wetlands Inventory. Website: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed April 6, 2026.

mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse wetlands impact that was not previously identified in the DNSP EIR.

**d) Fish or Wildlife Movement and Nursery Sites**

**Would the project: 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 wildlife nursery sites?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would 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 wildlife nursery sites and determined there to be a less than significant impact in this regard. The DNSP EIR determined that, while most of the Planning Area is developed and lacks habitat value, the Napa River, Napa Creek, and landscaped areas within the vicinity provide a wildlife corridor for fish, waterfowl, other birds, bats, and mammals. Development facilitated under the DNSP, such as the pedestrian trail improvements and railroad and road crossings, are not anticipated to substantially modify established migration or dispersal corridors; however, because some projects would be located near, on, and over Napa Creek and the Napa River, impacts as a result of these projects may occur. As such, in addition to compliance with all applicable General Plan policies relating to riparian habitats and wildlife corridors, the DNSP EIR implemented MM 4.C-1b to further reduce the effects on wildlife corridors. As such, impacts on fish and wildlife movement and nursery sites were found to be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP EIR, and the conclusions regarding biological resources impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site is fully developed and is located in an urban environment;<sup>35</sup> as such, the presence of wildlife corridors on the project site is unlikely. The proposed project would be required to conduct pre-construction special-status avian surveys as per MM 4.C-1b, as well as to comply with all General Plan policies and actions related to the preservation of wildlife corridors. As such, impacts related to wildlife corridors and nursery sites would be less than significant. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any

---

<sup>35</sup> California Department of Fish and Wildlife (CDFW). CDFW Lands Map. Website: <https://apps.wildlife.ca.gov/lands/>. Accessed April 6, 2026.

impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact to fish and wildlife movement and nursery sites that was not previously identified in the DNSP EIR.

**e) Conflict with Local Policies or Ordinances**

**Would the project: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and determined there to be a less than significant impact in this regard. The DNSP EIR determined that the Planning Area is covered by the City of Napa Municipal Code, and the City's General Plan. Development facilitated by the DNSP would not fundamentally conflict with any part of the Municipal Code or General Plan. Therefore, no conflict with any habitat conservation or natural community conservation plan would result. As such, the DNSP EIR found impacts to be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP EIR, and the conclusions regarding biological resources impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the Planning Area of the DNSP and therefore is governed by the same policies and ordinances as the DNSP. The proposed project would be required to comply with all policies found in the General Plan and regulating City's Municipal Code. Therefore, impacts related to conflicts with local policies and ordinances would be less than significant. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse biological resource impact that was not previously identified in the DNSP EIR.

**f) Habitat Conservation Plan/Natural Community Conservation Plan**

**Would the project: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would conflict with any Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). The Planning Area is not within any HCP or NCCP and, therefore, no conflict with any HCP or NCCP would result. As such, the DNSP EIR found impacts to be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the biological resources analysis presented in the DNSP EIR, and the conclusions regarding biological resources impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the Planning Area of the DNSP and, therefore, is governed by the same policies and ordinances as the DNSP. The proposed project would be required to comply with all policies found in the General Plan and regulations of the City's Municipal Code, and the project site is not within any HCP. As such, impacts related to conflicts with adopted HCPs would be less than significant. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

**MM 4.C-1b** Pre-Construction Special-Status Avian Surveys. No more than two weeks in advance of any tree or shrub pruning, removal, or ground-disturbing activity that will commence during the breeding season (February 1 through August 31), a qualified wildlife biologist will conduct pre-construction surveys of all potential special-status bird nesting habitat in the vicinity of the planned activity. Pre-construction surveys are not required for construction activities scheduled to occur during the nonbreeding season (August 31 through January 31). Construction activities commencing during the nonbreeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way). Nests initiated during construction activities would be presumed to be unaffected by the activity, and a buffer zone around such nests would not be necessary. However, a nest initiated during construction cannot be moved or altered.

If pre-construction surveys indicate that no nests of special-status birds are present or that nests are inactive or potential habitat is unoccupied: no further mitigation is required.

If active nests of special-status birds are found during the surveys: implement Mitigation Measure 4.C-1c.

**MM 4.C-1c** Avoidance of active nests. If active nests of special-status birds or other birds are found during surveys, the results of the surveys would be discussed with the California Department of Fish and Game and avoidance procedures will be adopted, if necessary, on a case-by-case basis. In the event that a special-status bird or protected nest is found, construction would be stopped until either the bird leaves the area or avoidance measures are adopted. Avoidance measures can include construction buffer areas (up to several hundred feet in the case of raptors), relocation of birds, or seasonal avoidance. If buffers are created, a no disturbance zone will be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted will take into account factors such as the following:

1. Noise and human disturbance levels at the Plan area and the nesting site at the time of the survey and the noise and disturbance expected during the construction activity;
2. Distance and amount of vegetation or other screening between the Plan area and the nest; and sensitivity of individual nesting species and behaviors of the nesting birds.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Biological Resources, the proposed project would not result in new significant biological resources impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant biological resources impact. 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                                                                                                                                                                                                                                                                                                                                                                           | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------|
| <b>V. Cultural and Tribal Cultural Resources</b>                                                                                                                                                                                                                                                                                                                                                   |                                                           |                                                             |                                                         |                                                         |                                                  |
| <i>Would the project:</i>                                                                                                                                                                                                                                                                                                                                                                          |                                                           |                                                             |                                                         |                                                         |                                                  |
| a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?                                                                                                                                                                                                                                                                                 | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.D-1                                         |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?                                                                                                                                                                                                                                                                               | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.D-2a<br>MM 4.D-2b                           |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries?                                                                                                                                                                                                                                                                                                            | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.D-4                                         |
| <i>Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:</i> |                                                           |                                                             |                                                         |                                                         |                                                  |
| d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or                                                                                                                                                                                                     | Less than significant impact with mitigation incorporated | None                                                        | None                                                    | None                                                    | MM 4.D-2a,<br>MM 4.D-2b,<br>MM 4.D-4<br>IM CUL-1 |

| Environmental Issue Area                                                                                                                                                                                                                                                                                                                                                                                                | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|-----------------------------------------|
| e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. | Less than significant impact with mitigation incorporated | None                                                        | None                                                    | None                                                    | MM 4.D-2a, MM 4.D-2b, MM 4.D-4 IM CUL-1 |

## Discussion

### Cultural and Tribal Cultural Resources

#### a) Historical Resources

**Would the project: Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

#### *Summary of DNSP EIR Findings*

The DNSP EIR determined that development facilitated by the DNSP could potentially have a significant impact on historic architectural resources. The DNSP EIR identified and mapped historic resources within the DNSP area. The Downtown commercial core is surrounded by several historic residential neighborhoods that contain historic architectural resources, including the Oxbow area located to the northeast. Implementation of the DNSP could potentially result in the alteration or demolition of recorded historic resources in Downtown. The DNSP EIR also found that new development under the DNSP could result in development pressure at or adjacent to historic resources, which could indirectly alter integrity through demolition or incompatible adjacent new construction.

The City General Plan contains policies to protect historic resources. Policies HR-1.1 through HR-1.20 provide the framework that the City uses to protect historic resources. Individual projects must demonstrate general consistency with the policies. In addition, the DNSP contains further design guidelines that must be consulted for any project involving a listed property or adjacent to a historic property (Appendix C).

The DNSP EIR determined that the implementation of City General Plan policies, in combination with guideline compliance, would reduce impacts to less than significant levels. However, because the guidelines are not regulatory requirements, in order to avoid potential impacts, MM 4.D-1, which mandates that any future development under the DNSP meet the intent and goals of the guidelines, was required. The DNSP EIR determined that impacts to historic resources are considered less than significant with the implementation of applicable General Plan policies and MM 4.D-1.

#### *Summary of 2018 Addendum*

The 2018 Addendum does not identify any change in the significance of historical resource impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

#### *Proposed Project Analysis and Conclusions*

Pursuant to the guidelines of the City's "Pastfinder" database, a records search at the Northwest Information Center (NWIC) was conducted on March 27, 2025, that also included a review of recorded resources and reports to determine the existence of previously documented historical resources within the project site and 0.5-mile surrounding it. The results of the record search indicate that 34 historic resources have been recorded within a 0.5-mile radius of the project site. The Franklin

Station Post Office is listed on the California Built Environment Resources Directory (BERD) with a California Historical Resources Status Code of 1S (individual property listed in the National Register by the Keeper; listed in the California Register (May 9, 1980, 65001087; January 1, 1985, 4558-0063-0000; January 11, 1985, NPS-85000133-0000; July 14, 2015). The Franklin Station Post Office was constructed in 1933, and was designed by William “Will” Corlett and Walter Reed of the Oakland firm Reed & Corlett. The building displays a distinctive art deco architectural style that was funded under the Roosevelt-era Public Buildings Act. Will Corlett is the son of architect William H. Corlett, who designed many notable structures throughout the Napa Valley.

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR.

***DNSP Historic Resources Design Guidelines:***

The DNSP Design Guidelines were prepared by Page & Turnbull on March 9, 2012. The goal of the assessment was to provide the City of Napa with a set of guidelines that can be referenced by City Staff, building owners, tenants, and residents to aid in making informed design decisions pertaining to historic resources in Downtown Napa. The Design Guidelines document the historic status of these resources, identify the character-defining features of each resource, and provide considerations for each building based on its historic significance. These guidelines emphasize best preservation practices and offer design options that respect and enhance the integrity of historic resources. The intent of these guidelines is to provide guidance and flexibility in the event of alterations to historic resources.

A letter of endorsement from the NCL stated that the restoration plans for the proposed project presented by the applicant to the Board of Directors on April 23, 2025, meet the requirements under the Preservation Covenant, and the Board of Directors are confident in endorsing the plans for the historic rehabilitation.

The following updated design guidelines are intended to be additive to the guidelines of the Downtown Napa Specific Plan, and to the site-specific guidelines developed for the Franklin Station Hotel (Appendix C).

- The hotel building should relate to the street and surrounding neighborhood with design elements and activate the street and provide a pleasant pedestrian experience.
- Select building materials, architectural details and finishes that 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.
- 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 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 façades. 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 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 window, adding loggias and dormers, varying cornices and rooflines.
- Vary materials and colors to enhance key components of a building's façade, such as window trim, entries, and projecting elements.

***Secretary of the Interior's Standards of Historic Properties:***

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The project-specific Design Guidelines incorporate the applicable Historic Resource Design Guidelines for Zeller's Hardware and the Uptown Theatre (1332-1364 Third Street). Impacts on historical resources would therefore be less than significant with implementation of Policies HR-1.1 through HR-1.20 and MM 4.D-1, which 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. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**b) Archaeological Resources**

**Would the project:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

***Summary of DNSP EIR Findings***

The DNSP EIR determined that archaeological resources have not been previously recorded in 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. In certifying the DNSP EIR the City required implementation of MM 4.D-2a and MM 4.D-2b, which require review of the City's "PastFinder" database and adherence to standard procedures in the event human or archaeological remains are discovered during construction activities. The City found that adherence to these mitigation measures would reduce the DNSP's impact on archaeological resources to less than significant levels.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of archaeological resource impacts. It incorporated DNSP MM 4.D-1, 4.D-2, 4.D-3 and 4.D-4, which require mitigation of impacts to and protection of any archaeological resources.

***Proposed Project Analysis and Conclusions***

As noted above, the guidelines of the City's "PastFinder" archaeological database was consulted, as required by DNSP MM 4D-2a, which also requires incorporating any recommendations of the PastFinder database. The PastFinder results indicate that the project site has a high archaeological sensitivity but that an archaeological evaluation has indicated no archaeological sites are present. The PastFinder results state that the recommendations of the report should be consulted and implemented where applicable to the proposed project. The report referenced in the PastFinder results is the Subsequent EIR for the Napa River/Napa Creek Flood Protection Project (SCH No. 1995044002 and 1997044002), which included mitigation for Workers Environmental Awareness Program (WEAP) training and inadvertent discovery procedures. Additionally, consistent with standard City procedures, the PastFinder report notes that previously undiscovered archaeological resources could be encountered during ground-disturbing activities and recommends implementation of appropriate inadvertent discovery measures.

In addition, a records search at the NWIC was conducted on March 27, 2025 (Appendix F) to determine the existence of previously documented archaeological resources. The results of the record search indicate that, in addition to the 34 historic resources noted above, one pre-contact archaeological resource has been recorded within a 0.5-mile radius of the project site. No archaeological resources have been recorded within the project site.

Consistent with the PastFinder results, NWIC records search, and Subsequent EIR for the Napa River/Napa Creek Flood Protection Project, ground-disturbing activities associated with construction have the potential to encounter previously unknown subsurface cultural resources. Therefore, consistent with MM 4.D-2a, as outlined in the DNSP EIR, which calls for implementing recommendations appropriate to site sensitivity, Implementation Measure (IM) CUL-1, which details WEAP training for archaeological resources, would ensure that impacts to archaeological resources associated with the development of the proposed project would be mitigated to a less than significant level.

As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**c) Human Remains**

**Would the project: Disturb any human remains, including those interred outside of dedicated cemeteries?**

***Summary of DNSP EIR Findings***

The DNSP EIR identified a less than significant impact related to disturbing human remains. Although unlikely to occur, development facilitated by the proposed DNSP could disturb any human remains, including those interred outside of dedicated cemeteries, as such remains could exist anywhere in Downtown. The DNSP EIR implemented MM 4.D-4, which ensures that treatment of any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities comply with applicable State laws. As such, impacts were found to be less than significant with mitigation.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of human remains impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. While it is unlikely that the presence of human remains exists within or near the project site, there is always the possibility that subsurface construction activities could potentially damage or destroy previously undiscovered human remains. With implementation of MM 4.D-4, impacts related to disturbance of human remains would be less than significant.

As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### **Tribal Cultural Resources**

#### **d) Listed or Eligible Tribal Cultural Resources**

**Would the project:** Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

#### ***Summary of DNSP EIR Findings***

Since the preparation of the DNSP EIR, Assembly Bill (AB) 52 was signed into law on September 25, 2014, and provides that any public or private “project with an effect that may cause a substantial adverse change in the significance of a Tribal Cultural Resource (TCR) is a project that may have a significant effect on the environment.” TCRs include “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historical resources.” Under prior law, TCRs were typically addressed under the umbrella of “cultural resources,” as discussed above. AB 52 formally added the category of “tribal cultural resources” to CEQA and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to Senate Bill (SB) 18.

SB 18 (Government Code § 65352.3) incorporates the protection of California traditional Tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American Tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to Tribes listed on the Native American Heritage Commission (NAHC) SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter timeframe has been agreed upon by the Tribe), indicating whether they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan. According to the DNSP EIR, the City completed the Tribal consultation process in accordance with SB 18 prior to the adoption of the DNSP and certification of the DNSP EIR.



In certifying the DNSP EIR, the City required implementation of MM 4.D-2a and MM 4.D-2b, which require review of the City's "PastFinder" database and adherence to standard procedures in the event human or archaeological remains are discovered during construction activities. The City found that adherence to these mitigation measures would reduce the DNSP's impact on the City's Native American archaeological resources to less than significant levels.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the impacts related to TCRs presented in the DNSP EIR, and the conclusions regarding TCRs remain unchanged.

***Proposed Project Analysis and Conclusions***

Pursuant to the City's "PastFinder" archaeological database, consulted in accordance with DNSP MM 4.D-2a, the project site is located in an area of high archaeological sensitivity, and site-specific recommendations were identified as detailed above. A records search conducted at the NWIC identified one pre-contact archaeological resource within 0.5 mile of the project site, but no archaeological resources have been recorded within the project site.

In addition, a Sacred Lands File (SLF) search conducted by the NAHC on March 28, 2025, returned positive results for TCRs within the surrounding project area. However, no known eligible or potentially eligible TCRs have been identified within the project site. Therefore, implementation of the proposed project would not result in direct impacts to known TCRs.

In the event that undiscovered TCRs are encountered during project-related ground disturbance, the proposed project would be required to implement MM 4.D-2a, MM 4.D-2b, MM 4.D-4, and IM CUL-1 in order to reduce potential adverse effects to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**e) Lead Agency Determined Tribal Cultural Resources**

**Would the project:** Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

***Summary of DNSP EIR Findings***

After the preparation of the DNSP EIR, AB 52 amended CEQA to identify an additional category of resources to be considered under CEQA identified as “tribal cultural resources” and added Public Resources Code Section 21074 which further defines TCRs, as described above. However, according to the DNSP EIR, the City completed the Tribal consultation process in accordance with State law prior to the adoption of the DNSP and certification of the DNSP EIR.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the impacts related to tribal cultural resources presented in the DNSP EIR, and the conclusions regarding tribal cultural resources remain unchanged.

***Proposed Project Analysis and Conclusions***

Consultation under AB 52 applies when a lead agency prepares an EIR or ND. It is not applicable to the preparation of an exemption or Addendum. The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR.

The City has not identified any significant TCRs on the project site. As previously mentioned above, the results of the NAHC SLF search were positive for TCRs within the project area. Although NWIC record search results failed to identify TCRs within the project site, the proposed project would still be required to implement MM 4.D-2a, MM 4.D-2b, MM 4.D-4, and IM CUL-1 in order to reduce potential adverse effects to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

**MM 4.D-1** 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.

- MM 4.D-2a** When specific projects are proposed under the Specific Plan that involves ground-disturbing activity into native soils, the City's "PastFinder" archaeological database shall be consulted. Recommendations provided by the "PastFinder" database shall be implemented based on a parcel's archaeological sensitivity. In those cases where a site-specific cultural resources study is necessary, it shall be performed by qualified cultural resources professionals. The study will include an updated records search, pedestrian survey of the project area, development of a historic context, sensitivity assessment for buried prehistoric and historic period deposits, and preparation of a technical report that meets federal and State requirements. If significant resources are identified and cannot be avoided, treatment plans will be developed in consultation with the City and Native American representatives to mitigate potential impacts to less than significant.

***MM 4.D-2a has been partially satisfied through the preparation of the NWIC record search, as well as consulting the City's PastFinder database, and would be fully satisfied with the implementation of IM CUL-1 below.***

- MM 4.D-2b** Should any archaeological artifacts be found during construction in the Planning Area, all construction activities within 50 feet shall immediately halt and the City must be notified. A qualified Archaeologist shall inspect the findings within 24 hours of the discovery. If the site is determined to contain significant cultural resources, funding will be provided to identify, record, report, evaluate, and recover the resources as necessary. Construction within the area of the find shall not recommence until impacts on the historical or unique archaeological resource are mitigated. Additionally, Public Resources Code Section 5097.993 stipulates that a project sponsor must inform project personnel that collection of any Native American artifact is prohibited by law.

- MM 4.D-4** The treatment of any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities shall comply with applicable State laws. Such treatment would include immediate notification of the Napa County Coroner. In the event of the Coroner's determination that the human remains are Native American, the Coroner shall notify of the Native American Heritage Commission, which would appoint a Most Likely Descendant (MLD) (PRC § 5097.98). The archaeological consultant, the Event Authority, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines § 15064.5(d)). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters. If the MLD

and the other parties could not agree on the reburial method, the Event Authority shall follow Section 5097.98(b) of the PRC, which states that “the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.”

***Project-specific Implementation Measures***

The following IM would ensure compliance with MM 4.D-2a:

**IM CUL-1      Worker Environmental Awareness Program Training**

Prior to the initiation of construction activities, all construction personnel conducting ground disturbance at the site shall be provided a Worker Environmental Awareness Program (WEAP) cultural resources “tailgate” training. The training shall include visual aids, a discussion of applicable laws and statutes relating to archaeological resources, types of resources that may be found within the project site, and procedures to be followed in the event such resources are encountered. The training shall be conducted by an Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Cultural Resources and Tribal Cultural Resources, the proposed project would not result in new significant cultural resources impacts that were not evaluated in the DNSP EIR, as it is located within the DNSP area footprint. The proposed project would not result in an increase in the severity of a previously identified significant cultural resources impact. There is no 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                                                                                                                                                          | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>VI. Energy</b><br><i>Would the project:</i>                                                                                                                                    |                                                           |                                                             |                                                         |                                                         |                                |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.B-1                       |
| b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?                                                                                     | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.B-1                       |

## Discussion

### a) Energy Use

**Would the project:**      **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

#### **Summary of DNSP EIR Findings**

As disclosed in the DNSP EIR, new development under the DNSP would result in the commitment of existing and planned sources of energy, which would be necessary for the operation of the proposed hotel development. However, the DNSP incorporates energy-conserving features, as required by the California Building Code and California Energy Efficiency Standards (Title 24) and the City's adopted High-Performance Building Ordinance, which provides for 15 percent higher energy efficiency than

Title 24 for new development. The DNSP also incorporates sustainable construction policies and features where feasible or as otherwise required by law that would strive to meet the Leadership in Energy and Environmental Design (LEED®) Program over the long-term, resulting in a more energy-efficient development and reduced consumption using local materials and labor. The DNSP also implements MM 4.B-1, which requires new developments to install charging units for electric vehicles at residences and businesses and develops incentives for businesses to include preferential parking for electric and/or hybrid vehicles. As such, impacts on energy use resulting from the DNSP were found to be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the impacts related to energy presented in the DNSP EIR, and the conclusions regarding energy remain unchanged.

### ***Proposed Project Analysis and Conclusions***

#### ***Construction***

PG&E provides electricity and natural gas service to the proposed project site. The construction of the proposed project would include grading, excavation, site preparation, and construction of the proposed mixed-use development. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the project site (e.g., site clearing and grading), and the actual construction of the building. Petroleum-based fuels, such as diesel fuel and gasoline, would be the primary sources of energy for these tasks. The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, excavators, forklifts, and pavers.

The overall construction schedule and process is already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. However, the proposed project does include several measures that would improve the efficiency of the construction process. Implementation of the Bay Area Air District BMPs would restrict equipment idling times to 5 minutes or less and would require the applicant to post signs on the project site reminding workers to shut off idle equipment. Thus, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

#### ***Operation***

The proposed project would consume energy as part of building operations and transportation activities. The proposed project would incorporate energy-efficient features to comply with the City's adopted High-Performance Building Ordinance. The proposed green building measures ensure the proposed project would not use energy in an inefficient or wasteful manner. The proposed project would incorporate the following green building measures:

- Bicycle parking to reduce vehicular load (in the mixed-use parking garage)

- EV charging spaces (in the mixed-use parking garage)
- Light pollution reduction
- Energy-efficient standards per code
- Cool roof design
- Reduced indoor/outdoor water use
- Increased daylighting thru design
- Building and material design to improve longevity of materials and prevent water intrusion
- Construction waste and recycling plan
- Building operations plan for recycling and waste reduction
- Building operations plan for energy-efficient operation and monitoring
- Building material selection to reduce pollutants and improve indoor air quality

As previously discussed, the proposed project would be considered to have a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 164–168, the proposed project would be considered to result in wasteful, inefficient, or unnecessary consumption of energy resources if it would conflict with the following energy conservation goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

#### *Decreasing Overall Per Capita Energy Consumption*

The proposed project's buildings would be designed and constructed in accordance with CALGreen energy efficiency standards of Title 24. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help to reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and would promote energy conservation. Moreover, the proposed project would be constructed according to the City's High-Performance Building Ordinance, which includes numerous energy-efficient and green building features as described above. Therefore, the proposed project would be consistent with this criterion. The decreasing reliance on fossil fuels and increasing use of renewable energy discussed below would also reduce per capita energy consumption for the proposed project.

#### *Decreasing Reliance on Fossil Fuels*

The proposed project would incorporate elements from the High-Performance Building Ordinance, and the California Green Building Standards Code (CALGreen). These project design features would reduce the amount of electricity used by the proposed project during operation and, consequently, the amount of fossil fuels needed to generate power to meet this demand.

*Increasing Reliance on Renewable Energy Sources*

As previously discussed, the proposed project would include the installation of EV charging in the mixed-use parking garage which would accelerate the region's and proposed project's adoption of EVs and allow the future transportation energy supply necessary for residents, employees, and visitors to be substituted with renewable energy sources. As such, the proposed project would facilitate a greater dependence on renewable energy sources for building and transportation energy demands. Therefore, the proposed project would be consistent with this criterion.

*Overall*

As discussed above, the proposed project's energy consumption would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, consistent with the guidance derived from Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 164–168. The construction-related and operation-related impacts related to electricity, natural gas, and fuel consumption would be less than significant. Therefore, the proposed project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects under any scenario. No additional analysis is required, and impacts would remain less than significant.

Thus, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts due to the application of design features and/or BMPs. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**b) Energy Efficiency and Renewable Energy Standards Consistency**

**Would the project: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?**

*Summary of DNSP EIR Findings*

The DNSP includes policies to encourage energy efficiency and green building techniques for project-level implementation. Buildout of the DNSP is subject to the regulations in the City's High-Performance Building Ordinance and Title 24. As such, the DNSP EIR determined a less than significant impact relating to consistency with a State or local plan for renewable energy or energy efficiency.

*Summary of 2018 Addendum*

The 2018 Addendum does not include any changes to the impacts related to energy presented in the DNSP EIR, and the conclusions regarding energy remain unchanged.

*Proposed Project Analysis and Conclusions*

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would be required to



comply with all DNSP policies relating to energy efficiency, as well as the City's High-Performance Building Ordinance and Title 24.

The proposed project would utilize electricity and natural gas from PG&E. According to PG&E, approximately 100 percent of its electricity is currently obtained from zero-emission sources and approximately 33 percent is from renewable energy sources.<sup>36</sup> Therefore, the proposed project's electricity provider meets the State's current objective of 33 percent renewable energy. The proposed project's electricity provider would also be required to meet the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030.

The proposed buildings would also be compliant with Title 24 Standards, the City's High-Performance Building Ordinance, and would adhere to the energy efficiency, water efficiency, and material conservation requirements. Also, the proposed project would be required to implement the requirement in MM 4.B-1, which would require TDM measures that require the installation of EV infrastructure (in the mixed-use parking garage), and would coordinate with the City to develop incentives for the implementation of preferential parking for EV or hybrid vehicles, thus reducing the fuel consumption associated with the proposed project. Therefore, the proposed project would be consistent with all applicable energy policies and plans, and this impact would be less than significant.

Therefore, the proposed project would be consistent with all applicable energy efficiency plans. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## Relevant DNSP EIR Mitigation Measures

**MM 4.B-1** In order to be consistent with the MSM A-1 and MSM A-2 Transportation Control Measures (TCMs), the City shall require that the following measures be included as potential Transportation Demand Management (TDM) strategies to be implemented by individual project applicants, where feasible and appropriate:

- Install charging units for electric vehicles at residences and businesses.
- Develop incentives for businesses to include preferential parking for electric and/or hybrid vehicles. (As required by the 2010 California Green Building Standards Code, Chapter 5, Section 5.106.5.2).

---

<sup>36</sup> Pacific Gas and Electric Company (PG&E). 2024. Electric Power Generation Mix. Website: [https://www.pge.com/assets/pge/docs/account/alternate-energy-providers/PCE\\_ElectricPowerGenerationMix.pdf](https://www.pge.com/assets/pge/docs/account/alternate-energy-providers/PCE_ElectricPowerGenerationMix.pdf). Accessed April 25, 2025.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Energy, the proposed project would not result in new significant energy resources impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant energy resources impact. There is no new information of substantial importance showing that significant energy resources impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

| Environmental Issue Area                                                                                                                                                                                                                                                               | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>VII. Geology, Seismicity, and Soils</b>                                                                                                                                                                                                                                             |                              |                                                             |                                                         |                                                         |                                |
| <i>Would the project:</i>                                                                                                                                                                                                                                                              |                              |                                                             |                                                         |                                                         |                                |
| a) Directly or indirectly cause 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. | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| iv) Landslides?                                                                                                                                                                                                                                                                        | No impact                    | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                                                           | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                      | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| 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? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?                                                                | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater                                                                                                                                 | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| disposal systems where sewers are not available for the disposal of wastewater?                         |                                                           |                                                             |                                                         |                                                         |                                |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.D-3                       |

## Discussion

### a) Earthquake Hazards

**Would the project:** Directly or indirectly cause 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; (ii) Strong Seismic Ground Shaking; (iii) Seismic-related ground failure, including liquefaction; (iv) Landslides.

#### i) Fault Rupture

##### **Summary of DNSP EIR Findings**

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map and determined there would be a less than significant impact because the DNSP Planning Area is not

located within an Alquist-Priolo Fault Rupture Hazard Zone.<sup>37</sup> The West Napa Fault Zone, which is the nearest active fault, lies approximately 1.4 miles west of the DNSP Planning Area.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would result in the construction of a mixed-use development in accordance with the DNSP and the areas previously evaluated by the DNSP EIR.

The project site is also not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known faults that cross the project site. The West Napa Fault zone, which is the nearest active fault, lies approximately 1.4 miles to the west of the project site.<sup>38</sup> Compliance with the California Building Standards Code (CBC) would further reduce impacts related to fault rupture. As such, impacts associated with the development of the proposed project within the DNSP Planning Area would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts associated with fault rupture.

**ii) Ground Shaking*****Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would directly or indirectly cause potential substantial adverse impacts involving strong seismic ground shaking and determined these impacts would be less than significant. The DNSP EIR indicated that the West Napa Fault lies within the City, approximately 1.4 miles west of the Planning Area of the DNSP, while the Green Valley-Concord Fault lies within 10 miles of the City. Several active faults with the potential to generate strong ground shaking in the City are within 50 miles of the City. The DNSP EIR determined that compliance with the CBC and with policies laid out in the General Plan related to earthquake safety would reduce the potential damage and personal injury that would result from ground shaking. Therefore, the DNSP EIR concluded that impacts related to seismic ground shaking would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

---

<sup>37</sup> California Department of Conservation. 2025. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 13, 2025.

<sup>38</sup> California Department of Conservation. 2025. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 13, 2025.

### ***Proposed Project Analysis and Conclusions***

As stated above, the proposed project is not within any Alquist-Priolo Fault Zones; however, the abundance of active faults within a 50-mile radius of the City would subject the project site to seismic ground shaking due to its proximity and potential earthquake magnitude of these faults. Compliance with building regulations outlined in the CBC, DNSP, and General Plan would reduce the impact of potential damage and personal injury caused by seismic ground shaking. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any significant impacts in this regard.

### **iii) Ground Failure**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR found that a major earthquake in the region may cause seismic-related ground failure that could potentially cause damage, destruction, or injury to development and persons resulting from development facilitated by the DNSP. The DNSP EIR determined that impacts would be less than significant.

As discussed in (ii), several active faults with the potential to generate strong ground shaking in the City are within 50 miles of the City, including the West Napa Fault located approximately 1.4 miles west of the Planning Area of the DNSP. However, development standards require proper engineering that minimizes seismic hazards through industry standard geotechnical practices and structural design. The City's Building Code addresses ground failure that may damage buildings. The code requires new construction to incorporate measures and materials that meet minimum performance standards. The City's General Plan policies further reduce the risk of ground failures. Policies HS-1.1 through 1.6 generally restrict development in high hazard areas or require geotechnical investigations.<sup>39, 40</sup>

---

<sup>39</sup> Policy HS-1.1: The City shall require that all new buildings be designed and constructed to resist stresses produced by earthquakes. To this end, the City shall require all new buildings to conform to the structural requirements of the most recently adopted edition of the Uniform Building Code (the Uniform Building Code was replaced by the International Building Code (IBC) in 2000. As noted above, the California Building Standards Code [CBC] is based on the IBC).

<sup>40</sup> Policy HS-1.2. The City shall discourage the siting of facilities necessary for emergency services, major utility lines and facilities, manufacturing plants using or storing hazardous materials, high occupancy structures (such as multi-family residences and large public assembly facilities), or facilities housing dependent populations (such as schools and convalescent centers) within areas subject to very strong, violent, or very violent ground shaking, as indicated in the ABAG Ground shaking Intensity Maps (Figure 8-1-A and B), unless no alternative is available and adequate mitigation measures can be incorporated into the project.

<sup>40</sup> Policy HS-1.3. The City shall require soils and geologic studies for proposed development with large client populations (such as schools and convalescent centers) within areas subject to very strong, violent, or very violent ground shaking, as indicated in the ABAG Shaking Intensity Map. Such studies should determine the actual extent of the seismic hazards, optimum location for structures, the advisability of special structural requirements, and the feasibility and desirability of a proposed facility in a specified location. Mitigation measures shall be incorporated as conditions of any project approval.

<sup>40</sup> Policy HS-1.4. The City shall require special construction features in the design of structures where site investigations confirm potential seismic hazards.

<sup>40</sup> Policy HS-1.5. The City shall require that facilities necessary for emergency services be capable of withstanding a

Development may be permitted if special construction features are incorporated in project design. While damage and injury cannot be completely avoided, the General Plan policies and City Building Code reduce the potential for damage and personal injury. Therefore, the DNSP EIR determined that impacts would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The proposed project site is not within a known liquefaction zone identified by the California Geological Survey (CGS).<sup>41</sup> Areas in close proximity to the Napa River were identified in the DNSP EIR as being susceptible to liquefaction. The project site is approximately 0.22 mile west of the Napa River; however, as stated above, new construction that follows the building regulations outlined in the CBC would reduce the potential impacts of liquefaction on development. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts in this regard.

## **iv) Landslides**

### ***Summary of DNSP EIR Findings***

The DNSP EIR determined that the buildout of the DNSP would result in no impacts related to landslides. According to the DNSP EIR, the Planning Area contains slopes that are less than 15 percent in grade and are not considered susceptible to landslides or slope failure. The gentle sloping topography of the area results in a very low potential for landslides or slope failure to affect any new development in the DNSP Planning Area.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The proposed project is in a flat, urban area and is not within a known landslide zone identified by the CGS.<sup>42</sup> As such, impacts associated with the development of the proposed project would be

---

maximum credible earthquake from any of the seven active faults in the region and remaining operational to provide emergency response.

<sup>40</sup> Policy HS-1.6. The City shall encourage the study and rehabilitation of high occupancy structures (such as multi-family residences and large public assembly facilities) susceptible to collapse or failure in an earthquake.

<sup>41</sup> California Department of Conservation. 2025. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 13, 2025.

<sup>42</sup> Ibid.



consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts related to landslides.

**b) Erosion**

**Would the project: Result in substantial soil erosion or the loss of topsoil?**

***Summary of DNSP EIR Findings***

The DNSP EIR determined that the buildout of the DNSP would result in a less than significant impact relating to erosion and loss of topsoil. According to the DNSP EIR, 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 (Construction General Permit), adopted by the California State Water Resources Control Board (State Water Board). In order to complete the Construction General Permit application, the applicant must first submit a Notice of Intent (NOI) to obtain coverage under the Construction General Permit. This Construction General Permit requires dischargers to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies the 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. Therefore, the DNSP EIR determined that compliance with requirements in the Construction General Permit during the DNSP buildout would reduce the impacts of erosion and topsoil loss to less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

***Proposed Project Analysis and Conclusions***

The project site is in a heavily urbanized area that is predominantly covered by paved surfaces; however, grading and construction of the proposed project would expose the project site to the effects of wind and water. The proposed project's development would exceed the one acre minimum and would be subject to the requirements in the Construction General Permit. Therefore, the proposed project would be required to develop and implement a SWPPP, which would reduce the potential impacts of erosion and topsoil loss to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts related to erosion or topsoil loss.

**c) Unstable Soils or Geologic Units**

**Would the project:** 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 landsliding, lateral spreading, subsidence, liquefaction, or collapse?

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether development facilitated by the DNSP could potentially be subjected to geologic hazards, including unstable geology. Geologic materials vary within the DNSP area, which may contain geologic hazards such as compressed fill materials with differential settlement characteristics. The soil survey conducted for the DNSP EIR indicates that the majority of the DNSP area consists of soils derived from alluvium sources, with the exception of a small area rock outcrop. Placing development in areas known to contain unstable geological units could cause significant damage to structural foundations if not properly engineered.

The following General Plan policies would help to ensure that any new development would be built to appropriate standards:

**Policy HS-2.1** The City shall seek to minimize grading and impermeable surfaces in high-erosion areas. If grading or impermeable surfaces are necessary, they shall be properly engineered and drained to reduce runoff and erosion.

**Policy HS-2.2** The City shall consider natural landform contours and geologic conditions in the development of roadways and individual project design.

**Policy HS-2.3** The City shall continue to regulate development on hillsides to reduce the hazards posed by soil erosion and landslides.

**Policy HS-2.4** The City shall require that an erosion control plan be prepared and approved for development on slopes of 15 percent or greater. The plan should include limitations on vegetation removal, revegetation, and installation of other erosion and sedimentation control measures.

The General Plan and Building Code require new construction to incorporate measures that reduce risk from geologic hazards. Policy HS-1.3, combined with building code requirements, would require detailed investigations of subsurface materials and require mitigation, if necessary, as a condition of approval.<sup>43</sup> The results of that investigation would help develop project engineering and methods to

---

<sup>43</sup> Policy HS-1.3. The City shall require soils and geologic studies for proposed development with large client populations (such as schools and convalescent centers) within areas subject to very strong, violent, or very violent ground shaking, as indicated in the ABAG Shaking Intensity Map. Such studies should determine the actual extent of the seismic hazards, optimum location for structures, the advisability of special structural requirements, and the feasibility and desirability of a proposed facility in a specified location. Mitigation measures shall be incorporated as conditions of any project approval.

mitigate geologic hazards. Therefore, impacts resulting from the DNSP were determined to be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The proposed project would be required to comply with all building standards outlined in the General Plan, as well as in the Building Division and CBC. The project site is located in a flat, urbanized area and, according to the CGS, is outside of any liquefaction or landslide zones.<sup>44</sup> As such the proposed project's impacts on liquefaction, landslides, or lateral spreading as a result of unstable soils would be less than significant. Compliance with General Plan policies related to seismic hazards as well as building standards outlined by the Building Division and the CBC would reduce the effects of subsidence and collapse due to unstable soils to less than significant levels. As such, impacts associated with the development of the proposed project would be less than significant, consistent with the analysis in the DNSP EIR; and the proposed project would not result in any significant impacts in this regard. No project-specific or site-specific mitigation is necessary for the proposed project.

#### **d) Expansive Soils**

**Would the project: Be located on expansive soil, creating substantial *direct or indirect* risks to life or property?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether development facilitated by the DNSP could potentially be subjected to geologic hazards, including expansive soils. Geologic materials vary within the DNSP area, which may contain geologic hazards such as compressed fill materials with differential settlement characteristics. Placing development on unstable soils could cause significant damage to structural foundations if not properly engineered.

Only site-specific testing could identify the presence of expansive soils. However, the soil survey prepared for the DNSP EIR identified a variety of soils, predominantly silt and clay loams. Therefore, it is very likely that the DNSP area contains some expansive soils.

General Plan policies would help to ensure that any new development would be built to appropriate standards. The General Plan and Building Code require new construction to incorporate measures that reduce risk from geologic hazards. Policy HS-1.3, combined with building code requirements would require detailed investigations of subsurface materials.<sup>45</sup> The results of that investigation would

---

<sup>44</sup> California Department of Conservation. 2025. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 13, 2025.

<sup>45</sup> Policy HS-1.3. The City shall require soils and geologic studies for proposed development with large client populations

help develop project engineering and methods to mitigate geologic hazards. The DNSP EIR found this impact would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would include a mixed-use development in accordance with the General Plan, Building Division, and CBC, in order to reduce potential impacts related to expansive soils. The proposed project also would be required to conduct a site-specific geological investigation prior to construction to determine the potential presence of any evidence of expansive soils in accordance with all applicable State and local requirements, including building code requirements. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any significant impacts. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified the DNSP EIR.

## **e) Septic Tanks**

**Would the project: Have soils incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR determined that all new development in the DNSP Planning Area would be served by existing municipal wastewater infrastructure; therefore, no impacts on soils related to the use of septic tanks or alternative wastewater systems would occur.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to impacts related to geology and soils presented in the DNSP EIR, and the conclusions regarding geology and soils remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. Consistent with the DNSP EIR, the proposed project would not include any use of septic tanks or alternative wastewater systems and would

---

(such as schools and convalescent centers) within areas subject to very strong, violent, or very violent ground shaking, as indicated in the ABAG Shaking Intensity Map. Such studies should determine the actual extent of the seismic hazards, optimum location for structures, the advisability of special structural requirements, and the feasibility and desirability of a proposed facility in a specified location. Mitigation measures shall be incorporated as conditions of any project approval.

connect directly to existing municipal wastewater systems on the project site. As such, impacts associated with the development of the proposed project within the DNSP area would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts.

**f) Destruction of Paleontological Resource or Unique Geologic Feature**

**Would the project:     Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

***Summary of DNSP EIR Findings***

The DNSP EIR states that the City is generally underlain by Pleistocene alluvium which has high paleontological potential, therefore subsurface excavations beyond previously disturbed soils could disturb or destroy paleontological resources. Therefore, impacts from the buildout of the DNSP on paleontological resources would be potentially significant. The DNSP EIR provided MM 4.D-3 which would require training earthmoving crews on the appearance of fossils, outlining the procedures to follow if any are discovered, and ensuring that a Paleontologist assesses the significance of any fossil find, and recovers it, if appropriate. With implementation of MM 4.D-3, impacts on paleontological resources would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of paleontological resource impacts presented in the DNSP EIR; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site is in an urban area with no known unique geological features. Since the DNSP Planning Area is generally underlain by geology with high paleontological potential, the effects of the proposed project on paleontological resources would be potentially significant. As evaluated in the DNSP EIR, and required in the MMRP for the Specific Plan, implementation of MM 4.D-3 would reduce the project's potential impacts on paleontological resources to less than significant levels. No additional analysis is required.

## **Relevant DNSP EIR Mitigation Measures**

**MM 4.D-3**     Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP), who is experienced in teaching non-specialists, to ensure they can recognize fossil materials and will follow proper notification procedures in the event any are uncovered during construction. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil

find and notifying a qualified Paleontologist, who will evaluate its significance. Training on paleontological resources will also be provided to all other construction workers but may involve using a videotape of the initial training and/or written materials rather than in-person training by a Paleontologist. If a fossil is determined to be significant and avoidance is not feasible, the Paleontologist will develop and implement an excavation and salvage plan in accordance with SVP standards.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Geology and Soils, the proposed project would not result in new significant geology and soils impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant geology and soils impact. 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                                                                                                          | DNSP EIR Determination             | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>VIII. Greenhouse Gas Emissions</b><br><i>Would the project:</i>                                                                |                                    |                                                             |                                                         |                                                         |                                |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?       | Significant and unavoidable impact | No                                                          | No                                                      | No                                                      | MM 4.B-5                       |
| b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | Significant and unavoidable impact | No                                                          | No                                                      | No                                                      | MM 4.B-5                       |

## Discussion

### a) Greenhouse Gas Emissions

**Would the project:**     **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

#### **Summary of DNSP EIR Findings**

The DNSP EIR identified a significant and unavoidable impact related to the impact of greenhouse gas (GHG) emissions on the environment. Using the Bay Area Air District GHG Model, the DNSP EIR determined that the per capita emission rate generated by the implementation of the DNSP would be 7.7 metric tons per service population per year, which exceeds the Bay Area Air District adopted threshold of 6.6 metric tons per service population per year. Therefore, GHG emissions of

development facilitated by the DNSP would have a significant impact using the methodology and significance criteria of the Bay Area Air District, the air quality regulatory agency with jurisdiction over the Planning Area. The DNSP EIR implemented MM 4.B-5, which imposes Green Building and Development Measures on new development projects and requires them to demonstrate that GHG emissions from operation would be reduced by 30 percent from business-as-usual 2020 emissions levels. According to the DNSP EIR, implementation of MM 4.B-5 would reduce GHG emissions associated with development facilitated by the DNSP. However, even with mitigation, emissions-related development facilitated by the DNSP would remain cumulatively significant because of the large size of the development and related substantial GHG emissions.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of GHG impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

### ***Proposed Project Analysis and Conclusions***

The DNSP EIR utilized the Bay Area Air District thresholds of significance for evaluating potential GHG impacts which (at the time) were based on meeting State-mandated GHG reduction targets for the year 2030. Since the time of the publication of the DNSP EIR, the Bay Area Air District has updated the recommended thresholds in the 2022 CEQA Air Quality Guidelines to address State-mandated GHG reduction targets for years beyond 2030. The new thresholds state that, if a project would contribute its “fair share” of what will be required to achieve California’s long-term climate goal of carbon neutrality by 2045, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change. The thresholds for new land use projects require projects to meet either of one of two enumerated Criteria “A” or “B” as shown below (Table 6). If a land use development project cannot demonstrate consistency with Criterion A or Criterion B, then that project would result in a potentially significant impact related to the generation of direct and indirect GHG emissions.

**Table 6: Bay Area Air District Thresholds for Land Use Projects**

| Thresholds for Land Use Projects                                                                                                                                                                                                                                                                  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>A. Projects must include, at a minimum, the following project design elements:</b>                                                                                                                                                                                                             |  |
| 1. Buildings                                                                                                                                                                                                                                                                                      |  |
| a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).                                                                                                                                                              |  |
| b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines.                                                                                     |  |
| 2. Transportation                                                                                                                                                                                                                                                                                 |  |
| a. Achieve a reduction in project-generated Vehicle Miles Traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations |  |



| <b>Thresholds for Land Use Projects</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA:</p> <ul style="list-style-type: none"> <li>i. Residential projects: 15 percent below the existing VMT per capita</li> <li>ii. Office projects: 15 percent below the existing VMT per employee</li> <li>iii. Retail projects: no net increase in existing VMT</li> </ul> <p>b. Achieve compliance with off-street electric vehicle (EV) requirements in the most recently adopted version of CALGreen Tier 2.</p> <p><b>B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b).</b></p> |
| <p>Notes:</p> <p>CEQA = California Environmental Quality Act</p> <p>CALGreen = California Green Building Standards Code</p> <p>Projects must be consistent with either Criterion A or Criterion B.</p> <p>Source: Bay Area Air Quality Management District (Bay Area Air District). 2022. CEQA Guidelines. April 20.</p>                                                                                                                                                                                                                                                                                                                                                                             |

Project consistency with Criteria A is based on incorporating project design criteria based on key attributes consistent with the 2022 Scoping Plan and long-term carbon neutrality goals. Projects incorporating these elements would be contributing their “fair share” of what will be required to achieve California’s long-term climate goal of carbon neutrality by 2045. These include criteria for building energy design (elimination of natural gas) as well as criteria related to reduction in transportation emissions via VMT reductions and installation of EV charging infrastructure.

The City does not have a GHG reduction plan or Clean Air Plan for evaluation against Criteria B. Therefore, the proposed project was evaluated against Criteria A, as outlined above.

*Construction*

The Bay Area Air District does not have thresholds of significance for construction-related GHG emissions. GHG emissions from construction activities are one-time, short-term emissions and therefore would not significantly contribute to long-term cumulative GHG emissions impacts of the proposed project. Therefore, construction emissions would be less than significant.

*Operation*

As previously discussed, the Bay Area Air District’s proposed 2022 GHG significance thresholds represent a method for determining whether the proposed project would be cumulatively considerable or whether the proposed project contributes to solving the cumulative problem of climate change, taking into consideration the State’s long-term climate goal of carbon neutrality by 2045.

The proposed project is evaluated against the design elements in Criterion A of Bay Area Air District’s 2022 GHG Significance thresholds as follows:

- **All-electric design:** The proposed project is anticipated to use natural gas, and therefore, the proposed project would not comply with this design element.

- Energy efficiency:** Electricity providers supplying electricity to the proposed project are required to comply with both the Renewable Portfolio Standard (RPS) and SB 350 and will meet these standards. PG&E, the electricity provider in Napa, is ahead of the SB 350 target with 50 percent of its base energy supply presently coming from renewable sources. Furthermore, the proposed project would comply with all relevant Energy Code and CALGreen requirements which would ensure energy efficiency. Therefore, the proposed project is consistent with this design element.
- VMT impact:** VMT is addressed for informational purposes consistent with the court's holding in *Olen Properties Corporation v. City of Newport Beach* (2023) 93 Cal.App.5th 270. In *Olen*, the court found that the City's use of LOS instead of VMT to analyze traffic impacts in an Addendum was appropriate because the program EIR used LOS. The court explained that CEQA does not require a lead agency to retroactively apply subsequently adopted metrics to prior CEQA documents, particularly where there is no feasible or meaningful way to compare LOS-based and VMT-based analyses. The court further confirmed that CEQA Guideline Section 15064.3 applies prospectively, and that the adoption of VMT as the preferred metric does not constitute "new information" requiring preparation of a subsequent or supplemental EIR. According to Bay Area Air District thresholds, projects that achieve a reduction in project-generated VMT below the regional average would meet this criterion. Residential projects are defined as 15 percent below the existing VMT per capita, and retail projects are defined as no net increase in VMT. According to the Association of Bay Area Governments (ABAG) Vehicle Miles Traveled Screening Map, the proposed project is in a transit priority area where VMT is at least 15 percent below the regional average (and Countywide average). In addition, the proposed project is not required to evaluate VMT based on *Olen* because the DNSP EIR predates the adoption of CEQA Guideline Section 15064.3. Regardless, the proposed project is expected to result in a net decrease in traffic trips in a transit priority area that is already at least 15 percent below the regional average. Therefore, the proposed project is consistent with this design element.<sup>46</sup>
- Tier 2 EV Charging Infrastructure:** The last design element relates to implementation of CALGreen Tier 2 level of EV charging infrastructure, which is beyond the mandatory CALGreen requirement of EV charging spaces. MM 4.B-1 (which would be implemented for air quality) requires the installation of charging units for EVs at residences and businesses, and the development of incentives for businesses to include preferential parking for electric and/or hybrid vehicles. However, MM 4.B-1 lacks the level of specificity needed to ensure the charging units for EVs at residences and businesses would meet Tier 2 requirements. Therefore, even with implementation of MM 4.B-1, the proposed project would not be consistent with this design element.

<sup>46</sup> Association of Bay Area Governments (ABAG). VMT Screening Map. Website: <https://mtc.maps.arcgis.com/apps/dashboards/6ff269ac90784909939f5ed8813ac5de>. Accessed April 25, 2025.

### *Summary*

The proposed project would satisfy two of the four design elements as outlined in the Bay Area Air District's GHG threshold Criterion A. Construction and operation of the proposed project would be required to comply with all federal, State, and local regulations related to GHG emissions. Consistent with the requirements of the DNSP EIR, the proposed 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. The proposed project would also implement MM 4.B-1 and MM 4.B-4, which are required by the DNSP EIR, which would serve to further reduce GHG emissions. However, because the proposed project would not satisfy all design elements outlined in the Bay Area Air District thresholds of significance, the proposed project would result in a significant impact related to GHG emissions. The DNSP EIR concluded that, even with mitigation, GHG emissions-related development facilitated by the DNSP would remain cumulatively significant because of the large size of the development and related substantial GHG emissions. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any peculiar GHG emission effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### **b) Greenhouse Gas Emissions Reduction Plan Conflict**

**Would the project:**     **Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR identified a significant and unavoidable impact related to conflict with a GHG emissions reduction plan. Even with the implementation of MM 4.B-5, which is intended to reduce GHGs on a project-by-project basis, the DNSP EIR determined that the impact relating to conflicts with a GHG emissions reduction plan would be significant and unavoidable.

With respect to consistency with AB 32 and its Climate Change Scoping Plan, this analysis acknowledges that the Bay Area Air District derived the per capita efficiency threshold from emission levels required to be met to achieve AB 32 goals. Therefore, these quantitative thresholds were used to assess whether the DNSP would conflict with AB 32. Because development facilitated by the DNSP would emit GHGs that exceed the service population-based efficiency thresholds of the Bay Area Air District which were derived based on AB 32 attainment goals, implementation of the DNSP would also conflict with AB 32 and its associated planning efforts. The City's General Plan, at the time the document was published, did not include policies explicitly designed to address GHG emissions and climate change. However, the Draft Napa Countywide Community Climate Action Plan included aggressive reduction measures to achieve 1990 GHG levels by 2020. Based on the substantial reductions required by these measures and the changing regulatory environment pertaining to GHGs, it was not clear whether the GHG reduction strategies described in the Draft Climate Action Plan were feasible for the DNSP. Thus, the DNSP could conflict with the goals identified in the Draft Napa Countywide Community Climate Action Plan.

***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of GHG impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

***Proposed Project Analysis and Conclusions***

The consistency of the proposed project with respect to ARB's 2022 Scoping Plan is discussed below.

***2022 Scoping Plan***

The ARB 2022 Scoping Plan for Achieving Carbon Neutrality was approved in December 2022 and expands on prior scoping plans and recent legislation, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the State's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or sooner. To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG emissions reductions, technology, and clean energy mandated by statutes; reduction of short-lived climate pollutants; and mechanical carbon dioxide (CO<sub>2</sub>) capture and sequestration actions. The 2022 Scoping Plan identifies three priority areas where emissions reductions are targeted to achieve its long-term goal of carbon neutrality. Those priority areas include transportation electrification, VMT reduction, and building decarbonization.

- **Building decarbonization:** As previously discussed, the proposed project has not committed to an all-electric design and would therefore not be consistent with this key priority area.
- **VMT impact:** As discussed in Impact GHG-1, the proposed project would have less than significant VMT impacts. Therefore, the proposed project is consistent with this key priority area.
- **Transportation Electrification:** As discussed previously, MM 4.B-1 would require implementation of charging units for EVs, as well as the development of incentives for businesses to include preferential parking for electric and/or hybrid vehicles. Therefore, the proposed project is consistent with this key priority area.

The proposed project would not be consistent with the 2022 Scoping Plan as it would not have an all-electric design. However, the proposed project would be required to comply with all federal, State, and local regulations regarding GHG emissions reduction goals and would implement MM 4.B-1, MM 4.B-4, and MM 4.B-5 to reduce GHG emissions, so the proposed project's impacts would be reduced as compared to the impacts evaluated in the DNSP EIR.

The proposed project would comply with, and in several respects exceed, the Green Building and Development Measures (GBDM) identified in Appendix C (AIR-2) (per MM 4.B-5 listed below). The GBDM identifies a range of recommended strategies intended to reduce GHG emissions through building efficiency, water conservation, material reuse and recycling, and reduced vehicle emissions. The proposed project incorporates numerous GBDM strategies directly into the proposed project's design and operational features.

The proposed project would incorporate the following GBDM strategies:

- Installation of efficient lighting in all buildings and incorporation of lighting controls and daylighting where feasible.
- Architectural lighting in the hotel and mixed-use building would incorporate energy efficient LED lighting, lighting control systems, and occupancy sensors that meet the requirements of the California Energy Code, including occupancy-based controls for guest rooms which would shut off lights automatically when guest rooms are unoccupied.
- Installation of light-colored “cool” pavements and strategically located shade trees along bicycle and pedestrian routes, including along Franklin Street, Second Street, and Randolph Street sidewalks. The concrete sidewalks would meet the City’s standards for “cool” color selection.
- Usage of water-efficient landscaping with native, drought-resistant species, and compliance with City’s Water Efficient Landscape Ordinance (NMC section 17.52.520).
- Installation of water-efficient irrigation systems and devices, such as soil moisture-based controls.
- Installation of pressure-regulating devices, high-efficiency irrigation heads, and smart irrigation controls which would be water efficient and designed to meet the requirements of the 2022 California Green Building Standards Code, Title 24, Part 11 (“CALGreen”) Section 5.304 and the City’s Water Efficient Landscape Ordinance (NMC section 17.52.520).
- The proposed project would design buildings and site improvements to be water-efficient, including installation of water-efficient fixtures and appliances.
- All metering devices, plumbing fixtures, commercial kitchen equipment, appliances, and landscape water of the proposed project would be water efficient and designed to meet the requirements of CALGreen and the City’s High Performance Building Water Efficiency requirements.
- The proposed project would utilize permeable surfaces and green roof technologies where appropriate.
- The proposed project would result in a net decrease of 810 square feet of impervious surfaces as compared to the current site. The proposed hotel and mixed-use buildings would feature landscape planters at the ground level as well as extensive landscaping at roof amenity areas including a swimming pool and water features.
- Planting media for the rooftop landscaping would be approximately 24” deep. Rainfall would infiltrate into the landscape planting media, reducing the effective impervious areas. The proposed project would include approximately 1,000 total square feet of planting for the hotel roof plan and 1,500 total square feet of planting for the mixed-use roof plan.
- The proposed project would reuse and recycle construction and demolition debris, including building materials.

- The proposed project's Construction Waste Management Plan would include the recycling and/or salvaging for reuse a minimum of 65 percent of the non-hazardous construction and demolition waste in accordance with CALGreen Section 5.408.1.
- The proposed project would also include salvage or reuse of the materials of the historic Franklin Station Post Office building in coordination with Napa County Landmarks (rather than dumping of materials). Reuse/ salvage could include repurposing such as using the materials for local building or art installation, use by a historical salvage broker, or selling the materials in a public sale.
- Provision of interior and exterior areas for recyclables and green waste collection.
- The proposed project would include receptacles for garbage, recycling, and green waste to manage waste throughout the property. The hotel loading dock and mixed-use building's trash room would include storage and collection for all three types of waste.
- Provision of facilities and infrastructure to support low- or zero-emission vehicles, including EV charging stations. EV charging stations and EV-ready parking spaces would be installed in the parking garage for the mixed-use building and in the hotel parking area, consistent with the requirements of CALGreen Sections 4.106.4.2 and 5.106.5.3.

Overall, the proposed project would be constructed in accordance with the current and applicable CALGreen and the California Building Energy Efficiency Standards (Title 24), which require increasingly stringent energy efficiency, electrification-supportive, and low carbon design measures that reduce building energy demand and associated indirect GHG emissions. The proposed project would also include EV charging infrastructure, as stated above, supporting the continued transition to zero-emission vehicles. The Emission Factors mobile source emissions model (EMFAC2025) data indicate that EV ownership in Napa County exceeds the Statewide average, reinforcing that on-site EV infrastructure would result in reduced mobile source GHG emissions over the life of the proposed project. In addition, the proposed project would provide bicycle and pedestrian amenities that encourage non-automobile travel which would further reduce vehicle trips and associated mobile GHG emissions. Finally, electricity service for the proposed project would be provided by Marin Clean Energy (MCE), a community choice aggregator that meets State RPS requirements through the provision of electricity derived from a greater portion of renewable and GHG emissions-free sources. Collectively, these features and those mentioned above would reduce operational GHG emissions and support achievement of the Specific Plan's GHG reduction objectives, including GHG reductions below 2020 business-as-usual levels.

The DNSP EIR concluded that, even with mitigation, GHG emissions-related development facilitated by the DNSP would remain cumulatively significant because of the large size of the development and related substantial GHG emissions. As such, impacts associated with the development of the proposed project would not be any more severe than what was disclosed in the DNSP EIR and the proposed project would therefore not result in any peculiar effects in conflict with any applicable plan, policy or regulation, and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## Relevant DNSP EIR Mitigation Measures

- MM 4.B-1** In order to be consistent with the MSM A-1 and MSM A-2 Transportation Control Measures (TCMs), the City shall require that the following measures be included as potential Transportation Demand Management (TDM) strategies to be implemented by individual project applicants, where feasible and appropriate:
- Install charging units for electric vehicles at residences and businesses.
  - Develop incentives for businesses to include preferential parking for electric and/or hybrid vehicles. (As required by the 2010 California Green Building Standards Code, Chapter 5, Section 5.106.5.2).
- MM 4.B-4** Implement Mitigation Measure 4.B-1 to ensure consistency with the Bay Area Air District TCMs to promote clean, fuel efficient and zero-emission vehicles.
- MM 4.B-5** The City shall ensure that applicant(s) for individual projects to be developed under the Specific Plan would incorporate Green Building and Development Measures as listed in Appendix C (AIR-2). Each increment of new development under the Specific Plan requiring a discretionary approval from the City (e.g., proposed tentative subdivision map, conditional use permit), would demonstrate that GHG emissions from operation would be reduced by 30 percent from business-as-usual 2020 emissions levels, in order to achieve 1990 levels by 2020.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to GHG emissions, the proposed project would not result in new significant GHG emission impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant GHG emission impact. There is no new information of substantial importance showing that significant GHG emission impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

| Environmental Issue Area                                                                                                                                                                        | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>IX. Hazards and Hazardous Materials</b><br><i>Would the project:</i>                                                                                                                         |                              |                                                             |                                                         |                                                         |                                |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                         | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| 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? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an                                                              | Not Addressed                | No                                                          | No                                                      | No                                                      | None                           |



| Environmental Issue Area                                                                                                                                                                                                                                                            | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| 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?                                                      | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | Not Addressed                | No                                                          | No                                                      | No                                                      | None                           |
| f) Impair implementation of or physically                                                                                                                                                                                                                                           | Not Addressed                | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                               | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|----------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| interfere with an adopted emergency response plan or emergency evacuation plan?                                                        |                        |                                                             |                                                         |                                                         |                                |
| g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires? | Not Addressed          | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Routine Transport, Use, or Disposal of Hazardous Materials

**Would the project:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

#### *Summary of DNSP EIR Findings*

The DNSP EIR evaluated whether development facilitated by the DNSP would include increased commercial, retail, and hotel land uses that could involve the transportation, use, or storage of hazardous materials that could cause a potential impact to public health and/or safety risks to facility workers, residents, and visitors, and the surrounding area. Proposed development would be expected to increase the use of chemical products considered hazardous materials or waste. The DNSP does not propose industrial uses that may use or transport hazardous materials.

Projects that involve the handling, using, or transporting of hazardous materials would be required to follow applicable laws and regulations. As described in the DNSP EIR, the City would require future development to comply with all applicable State and local regulatory requirements, including building code requirements, and coupled with the County's Hazardous Materials Management Plan which avoid or minimize the potential impacts. In addition, transportation routes would be identified and regulated by Caltrans to minimize impacts. Therefore, impacts would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The proposed project would include the construction of a hotel, as well as commercial uses, which could involve the transport, use, and disposal of hazardous materials. Development of the proposed project would also include the temporary transport, use, or disposal of typical hazardous materials (e.g., diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers) during the proposed project's construction phase. During construction and operation, the proposed project would be required to comply with all applicable federal, State, and local laws and regulations related to the safe transport, use, and disposal of hazardous materials, as well as General Plan policies HS-7.1 through HS-7.3, which would ensure that impacts remain less than significant.<sup>47</sup> The proposed project would not result in any peculiar hazardous materials effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any significant impacts.

#### **b) Risk of Upset**

**Would the project:      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?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether construction facilitated by the DNSP could potentially create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Construction activities associated with development may involve the transport and use of hazardous materials; however, they would be used in limited quantities and only temporarily stored on-site.

As discussed in the Hydrology and Water Quality discussion, the City would require construction projects to develop and implement a SWPPP, which contains measures to prevent and contain hazardous materials from spreading off-site. Furthermore, as discussed in (a) above, hazardous materials generated by demolition activities would be disposed of according to applicable laws and regulations. Compliance with existing regulations would address potential upsets and accidents, and, therefore, impacts were found to be less than significant.

---

<sup>47</sup> Policy HS-7.1: The City shall reevaluate, modify if necessary, and implement changes to the short-term goals of the Household Hazardous Wastes Element.

Policy HS-7.2: The City shall support the County's proposed Integrated Waste Management Plan.

Policy HS-7.3: The City shall support the County's role as the Certified Unified Program Agency for all County jurisdictions.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would be required to comply with all applicable federal, State, and local laws and regulations that relate to the safe transport, use, and disposal of hazardous materials. The proposed project would also be required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires the preparation and implementation of a SWPPP for construction activities. Impacts related to spills of hazardous materials would be mitigated by the SWPPP and would be reduced to less than significant levels. The proposed project would not result in any peculiar release of hazardous materials effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**c) Exposure of Schools to Hazardous Materials or Emissions**

**Would the project:    Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

***Summary of DNSP EIR Findings***

The DNSP EIR determined that no impacts would occur related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The DNSP EIR concluded that there are no current or proposed industrial uses in the Planning Area and, therefore, 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. As a result, no impact would occur.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. As disclosed in the DNSP EIR, four schools

(Blue Oak Elementary School, Blue Oak Middle School, Presbyterian Day School, and Napa Valley Nursery School Cooperative) are within 0.25 mile of the project site. Construction of the proposed project would involve the use of small quantities of hazardous materials typical of construction activities (e.g., fuels, oils, and lubricants). These materials are common to typical construction activities and do not pose a significant hazard to the public or the environment. The transportation, storage, use, and disposal of these materials would be required to comply with all applicable federal, State, and local regulations such as the Hazardous Materials Transportation Act and Section 31303 of the California Vehicle Code and would adhere to the applicable packaging and labeling regulations. Moreover, industrial uses would not be included in the proposed project. Therefore, operation of the proposed project would not include any hazardous emissions or handle hazardous materials within a quarter mile of a school. The proposed project would not result in any peculiar hazardous materials effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

#### **d) Hazardous Materials Sites**

**Would the project: 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?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether development facilitated by the DNSP on land previously impacted by release of hazardous materials could potentially expose residents or workers to hazardous materials or wastes. The EIR identified previously developed lots that may contain underground storage tanks. The tanks could pose a risk from leaked petroleum hydrocarbons or other chemical constituents. As a result, exposing residents was considered a potentially significant impact.

As summarized in the DNSP EIR, a number of sites were listed on regulatory agency databases. The DNSP EIR identified all properties listed on the State Water Board GeoTracker database within the DNSP area.

To address potential impacts, the DNSP EIR discusses City General Plan policies and the County's Certified Unified Program Agency. Policy HS-7.1 requires continued participation in the Unified Program.<sup>48</sup> The Unified Program evaluates risks and remediation efforts on contaminated sites. If necessary, a project would undertake investigations and remediation efforts with oversight by several agencies. This includes the County's Department of Environmental Management, the Regional Water Quality Control Board (RWQCB), and the California Department of Toxic Substances Control (DTSC).

---

<sup>48</sup> Policy HS-7.1: The City shall reevaluate, modify if necessary, and implement changes to the short-term goals of the Household Hazardous Wastes Element.

The DNSP EIR concluded that because completion of cleanup activities with agency oversight would be completed prior to construction (as a condition of approval), impacts would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site is listed as containing a known Leaking Underground Storage Tank (LUST) that has been remediated. The cleanup of heating/fuel oil has since been completed and the case has been closed since 1995, with no further incidents recorded.<sup>49</sup> The project site contains no other hazardous materials sites compiled pursuant to Government Code Section 65962.5.<sup>50</sup> Accordingly, the policies identified in the DNSP EIR related to contaminated sites are not applicable to the proposed project. The project site currently contains the Franklin Station Post Office building, as well as a parking lot and the Young Building. The proposed project would not be located on a hazardous materials site and would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any significant impacts.

### **e) Airports**

**Would the project:** For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

### ***Summary of DNSP EIR Findings***

The DNSP EIR identified that no impacts would occur related to airport-related safety hazards for people residing or working in the Planning Area. According to the DNSP EIR, the closest airstrip or airport to the Planning Area is the Napa County Airport located approximately 5.41 miles south, well outside of the Airport Land Use Plan. Therefore, there would be no potential impacts to any airports.

---

<sup>49</sup> California State Water Resources Control Board (State Water Board). 2025. GeoTracker–Napa Post Office (T0605500101). Website: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0605500101](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0605500101). Accessed December 1, 2025.

<sup>50</sup> California Environmental Protection Agency (Cal/EPA). 2025. Cortese List Data Results. Website: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed December 1, 2025.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, nor does it contain any known active underground storage tanks.<sup>51</sup> Accordingly, the policies identified in the DNSP EIR related to contaminated sites are not applicable to the proposed project. The project site currently contains the Franklin Station Post Office building, as well as a parking lot and the Young Building. The proposed project would not be located on a hazardous materials site and would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any significant impacts.

#### **f) Emergency Response and Evacuation**

**Would the project:      Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and determined there would be no impact. The DNSP EIR determined that the buildout of the DNSP could result in an increased resident, employee, and visitor population in the Planning Area, and although the buildout of the DNSP would alter the existing street network by removing the one-way couplets and forming two-way flow, it would comply with all emergency vehicle access requirements as a condition of construction. It was determined by the DNSP EIR that the buildout 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. Therefore, no impacts to emergency response or evacuation plans would occur.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

---

<sup>51</sup> California Environmental Protection Agency (Cal/EPA). 2025. Cortese List Data Results. Website: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed December 1, 2025.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would not result in any road closures and would employ a fire access plan which would provide adequate emergency access to the project site. Fire access would be provided via Franklin Street, Coombs Street, 2nd Street, and Randolph Street. Adequate emergency vehicle turn distances would be provided at the intersections of 2nd Street and Franklin Street, and 2nd Street and Randolph Street. Therefore, the proposed project would not conflict with the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impacts would occur. The proposed project would not result in any peculiar effects to an adopted emergency response plan or emergency evacuation plan and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**g) Wildland Fires**

**Would the project: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and determined there would be no impact. The DNSP EIR determined that the DNSP Planning Area is located within an urbanized area that is not immediately adjacent to any wildlands, and all construction that might be associated with the DNSP would be required to adhere to Building Fire Codes that are designed to minimize the potential for uncontrolled fires. Therefore, implementation of the DNSP would not expose people or structures to significant risk of wildland fires.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hazards and hazardous materials analysis presented in the DNSP EIR, and the conclusions regarding hazards and hazardous materials impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within an urbanized area and is outside of any Fire Hazard Severity Zone (FHSZ). As such the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the proposed project would not result in any new or more severe



impacts with respect to wildland fires that were not previously analyzed and disclosed in the DNSP EIR and no further environmental analysis is required.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Hazards and Hazardous Materials, the proposed project would not result in new significant hazards and hazardous materials impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant hazards and hazardous materials impact. There is no new information of substantial importance related to hazards and hazardous materials. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                              | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>X. Hydrology and Water Quality</b><br><i>Would the project:</i>                                                                                                                    |                              |                                                             |                                                         |                                                         |                                |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?                                            | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | No impact                    | No                                                          | No                                                      | No                                                      | None                           |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious   | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                    | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| surfaces, in a manner which would:                                                                                                                                                          |                              |                                                             |                                                         |                                                         |                                |
| (i) result in substantial erosion or siltation on- or off-site;                                                                                                                             | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;                                                                | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| (iii) 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; or | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| (iv) impede or redirect flood flows?                                                                                    | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?                     | No impact                    | No                                                          | No                                                      | No                                                      | None                           |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | Not Addressed                | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Water Quality

**Would the project:** **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

#### **Summary of DNSP EIR Findings**

The DNSP EIR considered the potential for development facilitated by the DNSP to violate water quality standards, violate waste discharge requirements, or otherwise degrade water quality by increasing nonpoint source pollutants in stormwater runoff.

The DNSP EIR identified the potential for pollutants to wash into local waterways during storm events. Pollutants include oils, fuels, heavy metals, pesticides, and other contaminants common to City streets and parking lots. Sediments may pollute local waterways caused by erosion from construction activities and urban uses such as landscaping maintenance and litter. The pollutants

could ultimately wash into the Napa River and Napa Creek, which are already identified as impaired waters. Therefore, the development facilitated by the DNSP could create a potentially significant impact.

However, development facilitated by the DNSP would be subject to City guidelines, ordinances, and permitting requirements. As described in the DNSP EIR, the RWQCB prepared the San Francisco Bay Basin Water Quality Control Plan, which provides regulations and measures that apply to development contemplated in the DNSP. Future projects would comply with applicable regulations and implement control measures through construction permits to ensure protection of municipal water sources, wildlife and aquatic habitat, and recreational resources.

The City is required to develop a Stormwater Management Plan and obtain a permit that allows for stormwater discharge. The Stormwater Management Plan describes BMPs, measurable goals, and timetables to achieve water quality goals. The plan and subsequent permits include educational components, apply to construction sites, and require operational measures to avoid or minimize pollutants from entering waterways.

The City also developed a Stormwater Runoff Pollution and Control Ordinance. The ordinance is intended to protect water resources and improve water quality. The City adopted standards for off-site and on-site stormwater management practices, prohibited deliberate discharges, established authority to manage and control pollutant sources, and adopted requirements for project site design that apply to project construction and operational phases. Therefore, impacts were found to be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would be required to comply with all applicable federal, State, and local laws and regulations governing water quality and stormwater quality standards. The proposed project would be required to create and implement a SWPPP that would further reduce potential impact related to stormwater quality. The proposed project would be divided into three DMAs which would divert stormwater into existing stormwater collection infrastructure beneath Franklin Street and Randolph Street. The proposed project would also include 1,875 square feet of pervious surfaces as well as tree boxes that would promote stormwater infiltration. The proposed project would not result in any peculiar water quality effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**b) Groundwater**

**Would the project: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin and determined there to be no impact in this regard. The DNSP EIR determined that the underlying groundwater aquifer in the Planning Area is not used for water supply purposes and no groundwater extraction beyond minor temporary dewatering activities that may be required for construction would be facilitated by the DNSP. The DNSP includes stormwater management guidelines encouraging design features that would increase pervious surfaces and, as a result, groundwater recharge. Therefore, the DNSP EIR determined that there was no adverse potential impact associated with development facilitated by the DNSP relative to the depletion of groundwater supplies.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would not include any groundwater extraction infrastructure and would include pervious surfaces and tree boxes that would facilitate groundwater infiltration. The proposed project is consistent with the development foreseen in the DNSP, and the proposed project would connect directly to existing water supply infrastructure beneath Franklin Street and Randolph Street. As stated in the City's 2020 Urban Water Management Plan, the City does not pump groundwater for municipal supply.<sup>52</sup> Neither direct nor indirect groundwater consumption is anticipated as part of proposed project operation. The proposed project would not result in any peculiar groundwater effects because it would not decrease groundwater supplies or interfere substantially with groundwater recharge and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

---

<sup>52</sup> City of Napa. 2020 Urban Water Management Plan. Website:  
<https://www.cityofnapa.org/DocumentCenter/View/9266/2020-UWMP-PDF?bidId=>. Accessed April 2, 2026.

**c) Drainage**

**Would the project:**     **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**i) result in substantial erosion or siltation on- or off-site;**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion and determined there to be a less than significant impact in this regard. The DNSP EIR determined that adherence to the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance would require erosion and sedimentation control measures for construction and operation; therefore, potential impacts related to erosion on or off-site would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The project site is developed with land area covered by existing impervious surfaces, such as asphalt and concrete. The proposed project would be required to develop and implement a SWPPP which would include measures to reduce the potential effects of erosion on- or off-site to less than significant levels. Further, the proposed project would include approximately 1,875 feet of pervious surface area on the project site to allow for water infiltration. The proposed project would not result in any peculiar erosion or siltation effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which

would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and determined there to be a less than significant impact in this regard. The DNSP EIR determined that although the Planning Area is largely developed and covered primarily by impervious surfaces such as roads, buildings, and parking lots, the development under the DNSP would include design features that incorporate stormwater management guidelines such as permeable pavers and stormwater retention areas. The DNSP EIR also determined that adherence to the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance would require source controls of stormwater volumes either through detention or local infiltration, as well as generally improve drainage facilities over existing conditions. As such, impacts on surface runoff from the buildout of the DNSP were found to be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would be required to develop and implement a SWPPP, which would include measures to reduce the potential effects of surface runoff to less than significant levels. Design features such as pervious surfaces and tree boxes would facilitate infiltration to reduce the effects of on or off-site flooding. The proposed project would not result in any peculiar surface runoff effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

- (iii) 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;**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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 and determined there to be a less than significant impact in this regard. The DNSP EIR determined that adherence to the City's Storm Water Management Plan and Stormwater Runoff Pollution Control Ordinance, as well as the incorporation of stormwater management design features, would generally improve drainage facilities over existing conditions and would limit the amount of runoff that would be



directed off-site and could even reduce volumes over existing conditions. As such, the buildout of the DNSP was found to have a less than significant impact of stormwater on existing drainage systems.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project includes stormwater management design features, such as pervious surfaces and tree boxes, which would reduce the amount of runoff that would be directed off-site and increase infiltration on the project site. The proposed project would also be required to develop and implement a SWPPP which would contain measures to reduce the effects of stormwater runoff and reduce potential strain on local drainage systems. The proposed project would not result in any peculiar stormwater capacity or pollution effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**(iv) impede or redirect flood flows?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows and determined there to be a less than significant impact in this regard. The DNSP EIR determined that the buildout of the DNSP would alter flood flows through new development on previously vacant sites, but the introduction of design features that incorporate stormwater management guidelines would likely result in a net reduction in stormwater flows off-site through the addition of pervious surfaces. As such, the impact on flood flows was found to be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur

within the area previously evaluated in the DNSP EIR. The proposed project would include design features that incorporate stormwater management guidelines, as well as incorporate a SWPPP which would reduce the level of stormwater directed off-site. The proposed project would not result in any peculiar flood flow effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**d) Risk of Pollutant Release Due to Inundation**

**Would the project: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation and determined there to be a less than significant impact in this regard. The DNSP EIR determined that the Planning Area was located outside of any areas at risk of tsunamis, seiches, or mudflows and that there would be no impacts related to these hazards.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the DNSP Planning Area, which is located outside of any areas at risk of tsunamis, seiches, or mudflows. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) No. 06055C0516F, the project site is in an area outside of the 0.2 percent annual chance floodplain.<sup>53</sup> Therefore, risk of flood hazards at the project site is minimal. The proposed project would not result in any peculiar inundation-caused pollutant release effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

---

<sup>53</sup> Federal Emergency Management Agency (FEMA). 2010. Flood Insurance Rate Map No. 06055C0516F. September 29. Accessed January 6, 2026.

**e) Water Quality Control or Sustainable Groundwater Management Plans Consistency**

**Would the project: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

***Summary of DNSP EIR Findings***

The DNSP EIR did not identify a significant impact related to conflict or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the hydrology and water quality analysis presented in the DNSP EIR, and the conclusions regarding hydrology and water quality impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would adhere to all local, State, and federal laws and regulations related to water quality and groundwater, as well as all General Plan and DNSP policies related to groundwater conservation and infiltration. Additionally, the proposed project would develop and implement a SWPPP, which would contain measures to maintain groundwater quality standards. The proposed project would not conflict with or obstruct any water quality and groundwater plans, would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, the proposed project would not interfere with the implementation of any adopted water quality control plan. Impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be less than significant.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Hydrology and Water Quality, the proposed project would not result in new significant hydrology and water quality impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant hydrology and water quality impact. There is no new information of substantial importance related to hydrology and water quality impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                               | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XI. Land Use and Planning</b><br><i>Would the project:</i>                                                                                                                          |                              |                                                             |                                                         |                                                         |                                |
| a) Physically divide an established community?                                                                                                                                         | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Division of an Established Community

**Would the project: Physically divide an established community?**

#### **Summary of DNSP EIR Findings**

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would physically divide an established community and identified a less than significant impact. The DNSP EIR determined that the buildout of the DNSP would not include any major planned roadways, such as freeways that would divide Downtown or individual neighborhoods or subareas. The DNSP EIR also determined that the DNSP would include objectives to increase circulation throughout the Planning Area, including new and improved pedestrian and bicycle pathways and converting streets from one-way to two-way. The DNSP also includes new land use designations to provide for sensitive transition to adjacent residential areas that surround the Planning Area, like DMU and Downtown Residential. As such, the DNSP EIR determined that the buildout of the DNSP would have a less than significant impact related to physically dividing an established community.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the land use and planning analysis presented in the DNSP EIR, and the conclusions regarding land use and planning impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is located in a dense urban area of Napa and is surrounded by commercial, retail, and public uses on all sides of the project site. The proposed project does not include any development that would block roadways or cut off circulation through the City. Construction of the proposed project would not require the permanent closing of any roadways and would be consistent with urban land use in the surrounding area. The proposed project would not result in any peculiar effects that would physically divide an established community and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would have a less than significant impact.

### **b) Conflict with Applicable Land Use Plans, Policies, or Regulations**

**Would the project: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR considered whether development facilitated by the DNSP could potentially conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to a general plan, specific plan, local coastal program, or zoning ordinance) that was adopted for the purpose of avoiding or mitigating an environmental effect. The DNSP EIR notes that a policy inconsistency is considered a significant adverse impact only if the inconsistency would result in a significant adverse physical impact based on the established significance criterion.

The proposed DNSP land use districts would not represent a substantial departure from the existing controls such that incompatible land uses would be developed. In general, it is anticipated that future development allowed by these new districts would result in a more cohesive Downtown Core Commercial area that transitions to mixed uses. The DNSP would provide development guidelines to guard surrounding neighborhoods from incompatible densities. Subsequent actions required for implementation of the DNSP include amendments to the City General Plan and Land Use Map and amendments to the City Zoning Code and maps to ensure consistency. Therefore, the DNSP EIR determined that the DNSP would not conflict with any applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the land use and planning analysis presented in the DNSP EIR, and the conclusions regarding land use and planning impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

Under the proposed project, land use designations under the DNSP and zoning would remain the same. The proposed project would, however, include amendments to the PD-37 Overlay. The proposed amendments would allow owners of the for-sale hotel units to place their units within the hotel's rental program and be used for transient purposes, such as a timeshare, instead of utilizing the for-sale hotel units as a condo-hotel. The proposed project would also modify the boundary of the PD-37 so the overlay includes the Young Building Parcel and no longer includes the Ace Hardware property. The proposed project also includes minor updates to the Design Guidelines (Appendix C) in order to incorporate the new mixed-use structure and remove the parking garage incorporated under the existing project approvals.<sup>54</sup> The Design Guidelines for the hotel component have not changed compared to the Existing Approvals. The Design Guidelines are intended to modify and be additive to the guidelines contained in the DNSP and Zoning Code. Because the PD-37 Zoning Overlay and Design Guidelines are more detailed and specifically tailored to the proposed project, they would take precedence over the DNSP Regulations and Guidelines. However, the changes proposed would still be within the interest of development contemplated for the DMU district within Downtown II and applicable to the site as evaluated in the DNSP EIR and do not include any revisions that would result in additional or increased environmental impacts. The proposed project would not result in any peculiar land use planning effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would have a less than significant impact.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Land Use and Planning, the proposed project would not result in new significant land use and planning impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant land use and planning impact. There is no new information of substantial importance related to land use and planning impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

---

<sup>54</sup> There are no changes to the site-specific Historic Guidelines specific to the rehabilitation of the post office structure as incorporated under the DNSP.

| Environmental Issue Area                                                                                                                                              | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XII. Mineral Resources</b><br><i>Would the project:</i>                                                                                                            |                        |                                                             |                                                         |                                                         |                                |
| 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?                                | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| 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? | No impact              | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a, b) Loss of Minerals Resources of Statewide or Local Importance

- 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?**

### Summary of DNSP EIR Findings

The DNSP EIR identified no impacts related to mineral resources. According to the DNSP EIR, the DNSP Planning Area is located in a developed urban area that has no known existing mineral resources and 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. Therefore,

implementation of the DNSP 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 and 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. Implementation of the DNSP would have no impact on mineral resources.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the mineral resources analysis presented in the DNSP EIR, and the conclusions regarding mineral resources impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is located within the Planning Area of the DNSP and therefore is mapped by the California Department of Mines and Geology as MRZ-1, which would classify the project site as an area where adequate information indicates a low likelihood of significant mineral resources. There are also no known mineral recovery sites within the Planning Area of the DNSP; therefore, the development of the proposed project would not have an impact in this regard. The proposed project would not result in any peculiar mineral resource effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Mineral Resources, the proposed project would not result in new significant mineral resource impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant mineral resources impact. There is no new information of substantial importance related to significant mineral resources impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.



| Environmental Issue Area                                                                                                                                                                                                                          | DNSP EIR Determination                                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|---------------------------------|
| <b>XIII. Noise</b><br><i>Would the project:</i>                                                                                                                                                                                                   |                                                           |                                                             |                                                         |                                                         |                                 |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | MM 4.I-1a, MM 4.I-1b, MM 4.I-1c |
| b) Generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                                     | Less than significant impact with mitigation incorporated | No                                                          | No                                                      | No                                                      | None                            |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or                                                                | No impact                                                 | No                                                          | No                                                      | No                                                      | None                            |

| Environmental Issue Area                                                                                               | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| public use airport, would the project expose people residing or working in the project area to excessive noise levels? |                        |                                                             |                                                         |                                                         |                                |

## Discussion

### a) Noise Levels in Excess of Adopted Standards

**Would the project:** **Result in Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

#### *Summary of DNSP EIR Findings*

The DNSP EIR evaluated whether full buildout of the development under the DNSP could generate a temporary increase in ambient noise level in the City during construction periods. The DNSP EIR identified MM 4.I-1a, MM 4.I-1b, and MM 4.I-1c to reduce construction-related noise impacts. These measures require implementation of best available noise control technologies (e.g., upgraded mufflers, acoustical shielding), restricted hours of operation for construction activities and equipment servicing, use of quieter construction methods where feasible (e.g., hydraulic tools), installation of temporary sound barriers for high-noise activities such as pile driving, and posting of on-site notices outlining noise control requirements. Additionally, the DNSP EIR provides the City with authority to require adjustments to construction methods in response to noise complaints. Implementation of these measures was found to reduce construction-related noise impacts to less than significant levels.

The EIR also evaluated whether operational noise from both stationary and mobile sources would result in a significant permanent increase in ambient noise levels. Stationary noise sources, such as mechanical ventilation (HVAC) systems, were determined to be subject to compliance with the City's General Plan policies and Municipal Code Noise Ordinance. The City of Napa Noise Ordinance (Municipal Code Chapter 8.08) limits exterior noise levels from mechanical equipment to 50 dBA at nearby residential property lines during nighttime hours (9:00 p.m. to 7:00 a.m.) and establishes an interior noise standard of 45 dBA. These standards are intended to protect sensitive receptors from

operational noise. Based on this regulatory framework, the DNSP EIR concluded that stationary operational noise would be less than significant with compliance. Mobile sources associated with increased traffic volumes were also analyzed. Although some roadways were projected to exceed 65 dBA  $L_{dn}$ , the DNSP EIR concluded that noise increases resulting from the Specific Plan buildout would not exceed the 3 dBA threshold for a perceptible change in ambient noise and would therefore be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of noise impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

### ***Proposed Project Analysis and Conclusions***

#### ***Construction Noise Impacts***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would implement MM 4.I-1a through MM 4.I-1c identified in the DNSP EIR to reduce construction-related noise impacts. These measures require incorporation of noise control best practices, restricted construction hours, acoustic shielding of equipment, use of quieter construction techniques, and the City's authority to enforce compliance. Implementation of these measures would ensure that construction noise impacts remain less than significant.

The need to perform pile driving is uncertain. However, if it is later determined that pile driving would be required, the proposed project would be required to implement MM 4.I-1b which requires a site-specific pile driving noise impact analysis be performed by a qualified acoustical consultant that would ensure pile driving noise impacts would be reduced to less than significant.

#### ***Operational Noise Impacts***

##### **Mobile Source Noise**

Based on the traffic study prepared by W-Trans for the proposed project,<sup>55</sup> operational traffic generated by the proposed project would generate 826 fewer average daily trips than the trips generated by the prior land use. Therefore, project traffic would not result in any perceptible increases in ambient noise levels and would clearly not exceed the 3 dBA increase significance threshold. As such, operational noise impacts from stationary and mobile sources would be less than significant, and no additional mitigation would be required.

##### **Stationary Source Noise**

The proposed project would include stationary noise sources, such as mechanical ventilation (HVAC) systems, typical of this type of development. These stationary noise sources would be required to comply with the noise performance standards of the City's Municipal Code Noise Ordinance. The City

---

<sup>55</sup> W-Trans, 2026. Draft Transportation Impact Study for the Franklin Station Project. June 22.

of Napa Noise Ordinance (Municipal Code Chapter 8.08) limits exterior noise levels from mechanical equipment to 50 dBA at nearby residential property lines during nighttime hours (9:00 p.m. to 7:00 a.m.) and establishes an interior noise standard of 45 dBA. These standards are intended to protect sensitive receptors from operational noise. Based on required compliance with this regulatory framework, stationary operational noise would be reduced to less than significant.

Therefore, the proposed project would not result in any peculiar ambient noise level environmental effects related to construction or operational noise, and no new mitigation measures are warranted. Impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **b) Groundborne Vibration**

### **Would the project result in: Generation of excessive groundborne vibration or groundborne noise levels?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the Specific Plan would generate excessive groundborne vibration or groundborne noise levels and concluded that impacts would be less than significant with mitigation. The EIR identified that conformance with General Plan policies related to development, construction activities, and noise regulation would reduce construction-related groundborne vibration impacts to less than significant.

However, the analysis identified that implementation of the DNSP could result in the placement of sensitive receptors in proximity to a known source of ongoing operational groundborne vibration—the Napa Valley Wine Train rail line. To address this, the EIR includes MM 4.I-3, which requires residential development within 200 feet of the rail station or mainline track to undergo a detailed site-specific vibration analysis conducted by a qualified acoustical consultant. Where necessary, design modifications such as vibration isolation techniques would be required to ensure compliance with applicable thresholds. Implementation of this measure would reduce potential groundborne vibration impacts to less than significant levels.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of groundborne vibration impacts; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

#### ***Proposed Project Analysis and Conclusions***

##### ***Construction Vibration Impacts***

A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The proposed project would be required to conform to all applicable General Plan policies and actions relating to City development, including Policy 10.1-I-18 of the City's 2040 General Plan, which requires all new development to mitigate

vibration levels below Federal Transit Administration (FTA) recommended criteria. Accordingly, construction activities would not adversely impact this structure. Therefore, compliance with the City's applicable General Plan policies would ensure that project-related construction groundborne vibration impacts would be reduced to less than significant.

#### *Operational Vibration Impacts*

The proposed project would not be a source of ongoing groundborne vibration. In addition, the project site is not located within 200 feet of the rail station or mainline track and therefore, MM 4.1-3 of the DNSP EIR is not applicable to the proposed project and no design modifications would be necessary. Therefore, no new or more severe vibration impacts would occur, and no additional mitigation measures are necessary. As such, groundborne vibration impacts would be consistent with the conclusions of the DNSP EIR and would remain less than significant.

#### **c) Airport or Private Airstrip Noise**

**Would the project result in: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR determined that no impact would occur relating to airport or private airstrip noise as a result of the buildout of the DNSP. There are no airport land use plans, public or private airports, or airstrips within 5 miles of the Planning Area; as such, no impacts would occur.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the airport noise analysis presented in the DNSP EIR, and the conclusions regarding airport noise impacts remain unchanged.

#### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the Specific Plan and within the same geographic area evaluated in the EIR. The project site is not located within the vicinity of a private airstrip and is not located within any airport land use compatibility plan area. The closest airport to the project site is the Napa County Airport, located approximately 5.1 miles south of the project site. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would exceed normally acceptable standards for the proposed land use development, and no impact would occur.

As such, potential airport-related noise impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts. Therefore, the proposed project would not result in any peculiar airport-related

effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## Relevant DNSP EIR Mitigation Measures

- MM 4.1-1a** Construction contractors for subsequent development projects within the Planning Area shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds, etc.) when within 400 feet of sensitive receptor locations. Additional techniques shall include, but not be limited to the following noise control elements:
- Nonresidential construction project activities (Monday through Friday) shall be limited to the hours of 7:00 a.m. to 7:00 p.m. with no startup of machines or equipment prior to 8:00 a.m. No delivery of materials nor equipment shall occur prior to 7:30 a.m. or after 5:00 p.m. No cleaning of machines or equipment shall occur after 6:00 p.m. No servicing of equipment shall occur past 6:45 p.m. Construction of weekends and holidays shall be limited to the hours of 8:00 a.m. to 4:00 p.m., unless a permit allows otherwise.
  - Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler shall achieve lower noise levels from the exhaust by approximately 10 dBA. External jackets on the tools themselves shall be used where feasible in order to achieve a reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.
  - All construction equipment shall not be placed adjacent to developed areas unless said equipment is provided with acoustical shielding.
  - Signs shall be posted at all construction site entrances to the property upon commencement of project construction, for the purposes of informing all contractors and subcontractors, their employees, agents, materialmen, and all other persons at the construction site, of the basic requirements of Mitigation Measures 4.1-a through 4.1-c.
- MM 4.1-1b** Should pile driving be necessary for a proposed project, the project sponsor would require that the construction contractor limit pile driving activity to the least disturbing hours of the day. To further mitigate pile driving and/or other extreme noise-generating construction impacts, a set of site-specific noise attenuation measures shall be completed under the supervision of a qualified acoustical consultant. No extreme noise-generating activities shall be allowed on weekends and holidays. Techniques included may include but not be limited to the following:

- Erect temporary plywood noise barriers around the construction site;
- Implement “quiet” pile driving technology (such as pre-drilling of piles and the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions;
- Use noise control blankets on building structures as buildings are erected to reduce noise emission from the site; Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings; and
- Monitor the effectiveness of noise attenuation measures by taking noise measurements.

**MM 4.I-1c**      The City shall condition approval of projects in the Planning Area near receptors sensitive to construction noise, such as residences and schools, such that, in the event of a justified complaint regarding construction noise, the City would have the ability to require changes in the construction practices to address the noise complaints.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Noise, the proposed project would not result in new noise impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant noise impact. There is no new information of substantial importance showing that significant noise impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

| Environmental Issue Area                                                                                                                                                                                            | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XIV. Population and Housing</b><br><i>Would the project:</i>                                                                                                                                                     |                              |                                                             |                                                         |                                                         |                                |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?                                                                                     | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |



## Discussion

### a) Growth Inducement

**Would the project:** Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

#### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would induce substantial unplanned population growth in an area, either directly or indirectly, and determined there would be a less than significant impact in this regard. According to the DNSP EIR, ABAG projects that the City is estimated to result in a citywide population increase of 5,900 persons, from 77,800 to 84,600 (an increase of approximately 8.7 percent), at the approximate buildout year for the DNSP (2035). It is assumed that some of this increase in population would occur in the City's Downtown. More specifically, within the DNSP Planning Area, the rezoning would accommodate an additional 627 net new housing units, which would generate approximately 1,379 net new residents within the Planning Area. This figure is based on the assumption that each housing unit would generate approximately 2.2 residents. The rezoning would, therefore, induce growth within the Planning Area. However, this growth would amount to less than 1 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. New housing that would be constructed under implementation of the DNSP would be consistent with the General Plan, which aims to encourage higher-density mixed-use developments within Downtown. Thus, while the DNSP would introduce new population to the Downtown, the projected housing development would not be expected to result directly in substantial unanticipated population growth. As such, the impact would be less than significant.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the growth inducement analysis presented in the DNSP EIR, and the conclusions regarding growth inducement impacts remain unchanged.

#### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would consist of a mixed-use development with commercial and hotel uses. The proposed project would be expected to introduce up to 100 new residents to the Planning Area, which is less than, but consistent with, the

anticipated growth level in the DNSP.<sup>56, 57</sup> The DNSP anticipated approximately 1,379 new residents within the DNSP Planning Area. The proposed project would also be consistent with the goals of the General Plan to introduce high-density mixed uses to the Downtown area. The proposed project would not result in any peculiar population growth effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **b) Displacement of Persons or Housing**

**Would the project: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR did not identify a significant impact related to the displacement of existing people or housing, necessitating the construction of replacement housing elsewhere. According to the DNSP EIR, the DNSP proposed to establish housing in the Planning Area in three zoning districts: DMU, Downtown Neighborhood, and Downtown Core Commercial. Since areas appropriate for housing have already been identified and planned for, 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. 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. At full buildout, the DNSP would add a net of 627 new housing units to the area. As such, the DNSP EIR determined that the implementation of the DNSP would not result in the substantial displacement of residences of housing units, and impacts would therefore be considered less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the population displacement analysis presented in the DNSP EIR, and the conclusions regarding population displacement impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur

<sup>56</sup> Based on an estimated 2.49 persons per household applied to the project entitlements allowing the development of up to 40 for-sale hotel units, which may be utilized for full-time use (incorporating the three partially finished but unoccupied units within the Young Building).

<sup>57</sup> California Department of Finance. 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Website: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>. Accessed December 10, 2025.

within the area previously evaluated in the DNSP EIR. The project site currently contains the Franklin Station Post Office building, as well as a parking lot and the Young Building. The portion of the Young Building that would be redeveloped as part of the proposed project would consist of condominium units, which would be renovated, but the proposed project would not result in the removal of residential units from the Young Building. Therefore, the proposed project would not require the removal of any existing housing from the area. The proposed project consists of a mixed-use development containing commercial and hotel uses and would therefore add new for-sale hotel units to the City's housing supply, as they may be utilized for full-time use, as discussed under the Growth Inducement discussion above. If built out to the maximum allowed by the Development Agreement, the proposed project would add up to 40 new for-sale hotel units, which may be utilized for full-time use. The proposed project would not result in any peculiar population displacement effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Population and Housing, the proposed project would not result in new significant population and housing impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant population and housing impact. There is no new information of substantial importance related to population and housing impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                                                                                                                                                                                                                                                                        | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XV. Public Services</b>                                                                                                                                                                                                                                                                                                                                                                                                      |                              |                                                             |                                                         |                                                         |                                |
| <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i> |                              |                                                             |                                                         |                                                         |                                |
| a) Fire protection?                                                                                                                                                                                                                                                                                                                                                                                                             | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Police protection?                                                                                                                                                                                                                                                                                                                                                                                                           | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| c) Schools?                                                                                                                                                                                                                                                                                                                                                                                                                     | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| d) Parks?                                                                                                                                                                                                                                                                                                                                                                                                                       | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| e) Other public facilities?                                                                                                                                                                                                                                                                                                                                                                                                     | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Fire Protection

**Would the project:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether development facilitated by the DNSP would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Development facilitated by the DNSP would increase demand for fire protection and result in an increased number of calls for service received in the Downtown area and regulatory oversight to serve the increased residential and employment population.

The City may require additional fire department staff to maintain response times and/or the construction or expansion of facilities in the DNSP area. However, the increased demand for fire protection services would be gradual and incremental over the 20-year timeframe of the DNSP. The City would conduct review and determine if construction of new fire station becomes necessary over the course of implementing the DNSP, during which time, the City would review individual projects and assess potential deficiencies.

Key to fire protection is capacity of water system to provide sufficient flow for firefighting purposes. The DNSP EIR evaluated the City's water distribution system. As discussed in the Utilities and Service Systems chapter of the DNSP EIR, the City continually identifies infrastructure improvement projects and funding to address Downtown's water needs, including adequate water flow for firefighting purposes. The current system meets fire flow demand, but future buildout of the DNSP would require upgrading approximately 50 percent of the existing water pipes. The DNSP EIR also considered General Plan policies that apply to future development and infrastructure improvements. Policies CS-1.2 and 1.3 would ensure adequate public services through the City's development review process.<sup>58</sup> Policy CS-1.4 requires that new development fund its fair share of construction for new or expanded public facilities. Therefore, impacts were found to be less than significant.<sup>59</sup>

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the fire protection analysis presented in the DNSP EIR, and the conclusions regarding fire protection impacts remain unchanged.

---

<sup>58</sup> Policy CS-1.2: Where new development requires the construction of new public facilities, the new development shall fund its fair share of the construction of those facilities. The City shall require dedication of land within newly developing areas for required public facilities, as allowed by law.

Policy CS-1.3: The City shall ensure through the development review process that adequate public facilities and services are available to serve new development.

<sup>59</sup> Policy CS-1.4: The City shall require, to the extent legally possible, that new development pays the cost of providing new public facilities and services and/or the costs for upgrading of all existing facilities that it uses, based on the demand for these facilities attributable to the new development; exceptions may be made when new development generates significant public benefits (e.g., low-income housing, significant primary wage earner employment) and when alternative sources of funding can be identified to offset foregone revenues.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. Fire protection services for the project site would be provided by the Napa Fire Department (NFD). The nearest station to the project site is Fire Station No. 1, which is approximately 0.18 mile west of the project site. As of 2024, NFD operates out of five stations and has a staffing ratio of one on duty fire fighter per 4,375 residents.<sup>60</sup> Overall, NFD response time for all priority incidents was within 6 minutes, 24 seconds 90 percent of the time.<sup>61</sup> The proposed project is consistent with the proposed development analyzed in the DNSP EIR, and there is nothing peculiar about the proposed project or the project site that would result in potential environmental effects not previously addressed in the DNSP EIR related to staffing or response times.

According to the DNSP EIR, the existing water distribution system will require upgrades to adequately serve the buildout of the DNSP, with approximately 50 percent of the existing water pipes requiring upgrades. As a result, the proposed project would be required to pay its fair share in water system improvements, to facilitate the required upgrades of the Downtown water system. Furthermore, the proposed project would be required to adhere to all goals and policies outlined in the General Plan and DNSP that relate to infrastructure improvements and fire safety. The proposed project would not result in any peculiar fire protection effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be less than significant.

**b) Police Protection**

**Would the project:** **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Police protection?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether development facilitated by the DNSP would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios,

<sup>60</sup> City of Napa. 2024. Napa Fire Department Annual Report. Website: <https://www.cityofnapa.org/DocumentCenter/View/14000/2024-Annual-Report-PDF>. Accessed December 10, 2025.

<sup>61</sup> Napa Fire Department (NFD). 2023. Organizational and Operational Analysis. Website: <https://www.cityofnapa.org/DocumentCenter/View/10761/Napa-Fire-Service-Analysis>. Accessed December 10, 2025.

response times, or other performance objectives for police protection. Development facilitated by the DNSP would increase demand for police protection and increase the number of calls for service received in Downtown, as well as regulatory oversight to serve the increased residential and employment population.

The City may require additional police department staff to maintain response times and/or the construction or expansion of facilities in the DNSP area. The increased demand for police protection services would be gradual and incremental over the 20-year timeframe of the DNSP. The City would review individual projects and assess potential deficiencies. Therefore, impacts to police services were found to be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the police protection analysis presented in the DNSP EIR, and the conclusions regarding police protection impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The Napa Police Department (NPD) is located 0.15 mile west of the project site. The NPD is organized into two main divisions: Operations and Administration/Support Services. The Operations Division is home to most of the NPD's sworn personnel and includes Patrol Officers, Detectives, Youth Services Bureau, Traffic Officers, and Homeless Outreach Services. The Administration/Support Division is home to professional staff and includes the Records Bureau, Property and Evidence, Personnel and Training, and the Communications Center. The NPD has approximately 76 sworn personnel, and 71 professional staff.<sup>62</sup>

The proposed project would add approximately 100 new residents to the area, which would increase demand for police services.<sup>63</sup> However, the proposed project would be consistent with the proposed development analyzed in the DNSP EIR, and there is nothing peculiar about the proposed project or the project site that would result in potential environmental effects not previously addressed in the DNSP EIR related to staffing, response times, or the need for additional police facilities. The proposed project would not result in any peculiar police protection effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts in this regard.

---

<sup>62</sup> City of Napa. 2025. About the Department. Website: <https://www.cityofnapa.org/323/Police-Department>. Accessed December 10, 2025.

<sup>63</sup> California Department of Finance. 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Website: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>. Accessed December 10, 2025.

**c) Schools**

**Would the project:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Schools?

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, and determined there would be a less than significant impact in this regard. According to the DNSP EIR, projects facilitated by the DNSP would increase the number of residential units and employees within Downtown, thereby potentially increasing student enrollment at local schools. The DNSP EIR projected an additional 627 net new housing units, which would generate approximately 84 school-aged children at buildout. These new students would be added to the district-wide enrollment incrementally over the entirety of the 20-year timeframe of the DNSP.

Additionally, new students would be distributed among the schools both within and near Downtown, thereby reducing substantial enrollment impacts at any one school. A portion of new students would also be expected to attend private schools in Downtown and other areas. The DNSP EIR also states that, pursuant to the Leroy F. Greene School Facilities Act of 1998, or SB 50, applicants for individual development projects facilitated by the DNSP would be 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 implementation of the DNSP. As such, the DNSP EIR determined that impacts on school facilities would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to schools presented in the DNSP EIR, and the conclusions regarding impacts to schools remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would be served by the Napa Valley Unified School District (NVUSD). The proposed project would be subject to school impact fees to offset any potential effects resulting from its development in accordance with



Government Code Section 65996. The proposed project would not result in any peculiar school effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**d, e) Parks and Other Public Services**

**Would the project:     Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Parks? Other public services?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities or need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, and determined there would be a less than significant impact in this regard. At the time the document was published, the City had approximately 11 acres of parkland per 1,000 residents, which is just below the standard of 12 acres per 1,000 residents listed in the General Plan. According to the DNSP EIR, development under the DNSP was estimated to generate approximately 1,379 new residents over the course of 20 years. Therefore, growth related to the DNSP would minimally reduce this ratio in 20 years to approximately 10.4 acres per 1,000 residents. Although no new park facilities were proposed in the DNSP, as stated in Section 5.16 of this Addendum, several new park facilities had been proposed by the City, unrelated to the DNSP. The DNSP EIR and other parks and recreation areas currently planned for the Planning Area, as well as dedication of parkland/in lieu fees required of future residential development would reduce the increased demand for parks generated by the buildout of the DNSP; therefore, impacts resulting from the full buildout of the development contemplated under the DNSP would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to parks and other public services presented in the DNSP EIR, and the conclusions regarding parks and other public services impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. As mentioned in Section XIV, Population and Housing, the proposed project would not result in a significant increase in population compared to the existing and proposed population as it is consistent with the buildout projections of the DNSP. The

proposed project would not result in any peculiar park or other public service effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any significant impacts in this regard.

## Relevant DNSP EIR Mitigation Measures

None.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Public Services, the proposed project would not result in new significant public services impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant public services impact. There is no new information of substantial importance related to public services impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                                                       | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XVI. Recreation</b><br><i>Would the project:</i>                                                                                                                                                            |                              |                                                             |                                                         |                                                         |                                |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?                       | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a, b) Existing Neighborhood and Regional Parks and Recreational Facilities

Would the project: a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

**Does the project:**     **b) include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, and determined there to be a less than significant impact in this regard. At the time the DNSP EIR was published, the City had approximately 11 acres of parkland per 1,000 residents, which is just below the standard of 12 acres per 1,000 residents listed in the General Plan. Development under the DNSP was estimated to generate approximately 1,379 new residents over the course of 20 years. Therefore, growth related to the DNSP would minimally reduce this ratio in 20 years to approximately 10.4 acres per 1,000 residents.

Although no specific parks or recreational facilities are proposed by the DNSP, other parks and open space improvements were proposed or planned in Downtown at the time the DNSP EIR was published that would serve residents of DNSP-related developments. The most prominent of these projects was the multi-purpose Oxbow Commons. This project was a planned flood protection bypass channel funded by the federal government and local sales tax (Measure A) and managed by Napa County Flood Control and Water Conservation District that would also serve as a park when not utilized for flood protection purposes. A series of trails would provide an alternative pedestrian/bicycle connection under Soscol Avenue from the Oxbow Commons area to First Street and Pearl Street in the Downtown core, which has since been completed. In addition, the DNSP acknowledged how the fenced-off China Point Park would be replaced by the mouth of the bypass and a new park, which has since been constructed, would be located at the southwest corner of Soscol Avenue and First Street called China Point Overlook.

Additionally, another park began construction in 2011 at the southwest corner of Third Street and Soscol Avenue (Riverfront Green) which has since been completed after the DNSP was published. Another planned improvement was the riverfront trail, which would provide a north-south pedestrian route along the Napa River and include additional recreation facilities. Other parks noted in the Specific Plan include the relocation of the Skate Park potentially to Solomon Park, the potential replacement of the surface parking lot at the southwest corner of Main and Pearl streets with a 0.5-acre park following replacement of the parking spaces, and the expansion of the remainder of Heritage Park to create a linear parkway along the top of the banks of Napa Creek in the block bounded by Pearl/Coombs/Clinton/Main streets. Although no specific parks are proposed by the DNSP, other parks and recreation areas planned for the Planning Area by the City, as well as dedication of parkland/in lieu fees required of future residential development would reduce the increased demand for parks generated by new residents living in Downtown. Additional residents would also be anticipated to utilize other parks in the immediate vicinity of the Planning Area, including the 9.5-acre Fuller Park and the 12.7-acre Oxbow Preserve. Therefore, the DNSP EIR determined that impacts regarding parks and recreation would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to recreation presented in the DNSP EIR, and the conclusions regarding recreation impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would not result in any peculiar displacement of recreation effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Recreation, the proposed project would not result in new significant recreation impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant recreation impact. There is no new information of substantial importance related to recreation impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                         | DNSP EIR Determination             | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XVII. Transportation</b><br><i>Would the project:</i>                                                                                                         |                                    |                                                             |                                                         |                                                         |                                |
| a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?                   | Significant and unavoidable impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?                                                          | Not Addressed                      | No                                                          | No                                                      | No                                                      | None                           |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | Less than significant impact       | No                                                          | No                                                      | No                                                      | None                           |
| d) Result in inadequate emergency access?                                                                                                                        | Less than significant impact       | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Affect to Circulation System

**Would the project: Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

#### *Summary of DNSP EIR Findings*

The DNSP EIR evaluated the potential traffic conditions and the effects of the buildout of the DNSP to determine whether the City's planned circulation system would be able to accommodate future traffic demands associated with buildout. The Existing Plus Project scenario was developed by adding the net new trips generated by the buildout of the DNSP land use projections to the existing traffic volume. Because the DNSP includes the conversion of the existing one-way segments of First Street, Second Street, Third Street, and Fourth Street to two-way travel, the existing baseline traffic volumes were first adjusted to reflect two-way circulation. It is assumed that the two-way reconfiguration would not require any major modifications to study intersections, such as construction of new medians or expansion of right-of-way for new turn pockets or travel lanes, apart from the Jefferson Street/First Street intersection, where a southbound left turn lane would need to be constructed. All study intersections in the Existing Plus Project scenario would continue to operate at acceptable levels of service, except the unsignalized intersection of SR-29 northbound off-ramp/First Street, which would continue to operate at Level of Service (LOS) F for the AM and PM peak-hours. Although this intersection already operates at LOS F under existing conditions, development under the DNSP would add at least 50 peak-hour trips to the intersection, which would contribute to continuing operational failure. For the intersection to operate at an acceptable LOS, the intersection should be signalized.

Because the intersection operates at LOS F and meets peak-hour signal warrants under existing conditions, it is considered an existing deficiency. While development under the DNSP would not cause the impact, it adds at least 50 peak-hour trips to the intersection and exacerbates the unacceptable operation. The intersection would operate at acceptable LOS B or better if signalized; however, the City of Napa, as Lead Agency, could not implement this improvement without the approval of Caltrans. Further, the intersection is near the City's intersection of California Boulevard and First Streets, which is being considered for a roundabout. The operation of the two intersections would conflict, as stacking and queueing could intrude into the opposing intersections. The DNSP EIR implemented MM 4.L-1a, which requires the City to continue to work with Caltrans to install a traffic signal at the intersection of SR-29 northbound off-ramp/First Street or identify other acceptable alternatives to the signal.<sup>64</sup> However, previous discussions with Caltrans indicate that this improvement would be difficult to approve, as installation of a traffic signal would require a design exception due to the close spacing (approximately 350 feet) to the California Boulevard/First Street

---

<sup>64</sup> MM 4.L-1a: The City shall continue to coordinate with Caltrans to install a traffic signal at the intersection of SR 29 Northbound Offramp/First Street or identify other acceptable alternatives to the signal. If the signal pursued, the City shall work closely with Caltrans to ensure that the signal timing is properly synchronized with the closely spaced intersection to the east at California Boulevard/First Street.

intersection to the east, which is unlikely to be granted. For these reasons, the DNSP EIR determined that the implementation of the DNSP would have a significant and unavoidable impact at the intersection of SR-29 northbound off-ramp/First Street. Subsequent to the DNSP adoption, the City improved this intersection with an unsignalized roundabout system.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not identify any change in the significance of impacts related to conflicts with a program plan, ordinance or policy of the circulation system; however, it incorporated additional explanation regarding the implementation of mitigation measures to ensure clarity and enforceability.

### ***Proposed Project Analysis and Conclusions***

#### ***Roadway Access and Circulation***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. According to the Transportation Impact Study prepared for the proposed project by W-Trans, included within Appendix G, the proposed project is expected to generate an average of average of 1,046 trips per day, including 57 AM peak-hour trips and 81 trips during the PM peak-hour. Compared to the existing post office, the proposed hotel and housing would be expected to generate an average of 826 fewer trips per day, with 92 fewer morning peak-hour trips and 121 fewer evening peak-hour trips. Because the proposed project would generate substantially fewer trips than have historically been associated with use of the project site, a full traffic analysis was not required. Further, a valet parking operation plan would be developed. The plan would include items such as hours of operation, location of valet stand, location of parking lots to be used, route of vehicles being moved to and from the site, and copies of any contractual agreements between the valet operator and parking lots.<sup>65</sup>

The construction of the proposed project would not result in any road closures. Therefore, the proposed project would not result in a significant number of new trips compared to existing uses and proposed project traffic would not significantly impact roadways surrounding the site. Furthermore, proposed driveways would be constructed in accordance with all City standards.

#### ***Pedestrian and Bicycle Access and Circulation***

The project site is surrounded by a fully connected system of sidewalks. Crosswalks and curb ramps also exist at nearby intersections. Class II bike lanes currently exist on Third Street between Jefferson Street and Silverado Trail and are proposed on Coombs Street between Pearl Street and Division Street. The proposed project would reconstruct the existing sidewalks along the project site frontage on Second Street, Randolph Street, and Franklin Street. In addition, the proposed project would

<sup>65</sup> The purpose of the valet parking operation plan relates to parking availability and accessibility for the proposed project. As explained in *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, the social inconvenience of having to hunt for scarce parking spaces is not an environmental impact. Accordingly, absent evidence that parking conditions would cause a reasonably foreseeable physical environmental impact, parking adequacy is not required to be analyzed as a significant effect in a CEQA document.



construct new sidewalk bulb-outs and ADA-curb ramps with truncated domes to enhance pedestrian accessibility and safety in accordance with the DNSP Design Guidelines. The proposed project would not result in any changes to existing bicycle facilities or any modifications that would affect them. As such, the proposed project would have a less than significant impact on pedestrian and bicycle facilities.

#### *Transit Facilities*

The Napa Valley Transportation Authority (NVRTA) Vine Transit provides fixed route bus service in the City of Napa. NVRTA Local Routes B, C, F, and G provide service to destinations throughout Napa, and stop on the corner of Third Street and Brown Street. The project site is also approximately 0.11 mile west of the Third Street at Brown Street bus stop, which is accessible via sidewalks along Randolph Street, Coombs Street, and Third Street. As such, the proposed project would not impact existing or future transit facilities, and would not interfere with a program, plan, ordinance, or policy as it relates to transit facilities.

#### *Conclusion*

In conclusion, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### **b) CEQA Guidelines Section 15064.3**

**Would the project:**      **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

#### ***Summary of DNSP EIR Findings***

This CEQA checklist question specifically addresses the new transportation metric of VMT, and whether a land use project would exceed an applicable threshold of significance. At the time the DNSP EIR was published, CEQA Guidelines Section 15064.3 was not in effect; as such, the DNSP EIR did not address consistency with this section.

#### ***Summary of 2018 Addendum***

The 2018 Addendum does not include analysis related to VMT consistent with the DNSP EIR.

#### ***Proposed Project Analysis and Conclusions***

The DNSP EIR was certified in 2012 prior to adoption of Senate Bill 743 in 2013 and the 2018 amendments to the CEQA Guidelines establishing VMT as a metric for evaluating transportation impacts under CEQA. The DNSP EIR therefore analyzed transportation impacts using the methodologies and significance criteria in effect at the time of certification. CEQA Guidelines Section 15064.3 reflects a post-certification change in transportation impact methodology. Subdivision (c) of Section 15064.3 provides that the provisions of the section apply prospectively such that CEQA does not require retroactive application of subsequently adopted significance criteria or analytical

approaches when preparing an Addendum to a previously certified EIR. (See also CEQA Guidelines Section 15007(b)).

Once an EIR has been certified, further environmental review is limited, and an Addendum is appropriate where no new significant impacts would occur and no previously identified impacts would be substantially more severe (PRC § 21166; CEQA Guidelines § 15164). Courts have consistently held that changes to the CEQA Guidelines or analytical methodology do not constitute “new information” requiring supplemental environmental review where the environmental effects at issue were known or could have been known at the time the original EIR was certified (see *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788; see also, *Olen Properties Corporation v. City of Newport Beach* (2023) 93 Cal.App.5th 270 [holding that the City’s use of LOS instead of VMT to analyze traffic impacts in an Addendum was appropriate because the program EIR used LOS, and there is no feasible way to compare LOS with VMT]).

Accordingly, this analysis is limited to evaluating whether the proposed project would result in new or more severe environmental impacts beyond those analyzed in the DNSP EIR. The Addendum does not reopen or revise the DNSP EIR’s program-level transportation analysis. Transportation demand and circulation effects associated with development within the DNSP area were previously evaluated, and the project would not result in transportation impacts that are new or substantially more severe than those previously analyzed.

Accordingly, a consistency analysis under CEQA Guidelines Section 15064.3, subdivision (b), is not required for this Addendum.

### **c) Roadway Safety Hazards**

**Would the project: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

#### ***Summary of DNSP EIR Findings***

The DNSP EIR determined that the buildout of the DNSP would not result in significant impacts related to roadway safety hazards resulting from geometric design features or incompatible uses. Implementation of the DNSP would facilitate development throughout the DNSP area. The locations and/or specific design elements of these developments were not known when the document was published. Therefore, it was beyond the scope of the DNSP EIR to determine whether the proposed project would adversely affect traffic safety. However, considering that each individual development would be required to be consistent with appropriate regulations and design standards in effect at the time, the DNSP would cause a less than significant impact on safety for motor vehicles, bicycles, and pedestrians. The DNSP does include modifications to the roadway network in the Planning Area by converting existing one-way couplets to two-way traffic. According to the DNSP EIR, the ultimate implementation of the two-way street conversion would require a detailed engineering and traffic operations assessment, including, but not limited to, an evaluation of the needed improvements to

intersection geometry, striping, signage and traffic control at the existing signalized and unsignalized intersections along the streets recommended for two-way conversion. Implementation of the policy provisions to maintain roadways and improve traffic flow in the DNSP, specifically Policies TR-1.2 through TR-1.7, in conjunction with enforcement of modern design standards in the construction of new roadway facilities, would ensure that construction or conversion of roadway facilities associated with the DNSP would not result in unacceptable safety conflicts. Therefore, the DNSP EIR concluded that impacts would be less than significant.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to roadway hazards presented in the DNSP EIR, and the conclusions regarding roadway hazard impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

Access to the proposed parking garage would be provided from Second Street. The City of Napa Public Works Department has developed a design standard titled "Vision Triangle and Fencing Requirements" (Standard S-25) for various configurations of private driveways. The standard for Arterial Streets depicts vision triangles established laterally by measuring 20 feet outward from each side of the driveway along with a 20-foot depth measured from the back of sidewalk. For fronting roadways with on-street parking, red curbs are marked 20 feet in each direction from the ends of the driveway ramp. As described in Appendix G, W-Trans conducted and reviewed the implications of applying Standard S-25 to the proposed project's garage access on Second Street and determined that the required vision triangles could not be achieved. The outer walls of the proposed building extend to the back of sidewalk and effectively limit visibility from the 20-foot setback specified in the standard.

Standards pertaining to sight distance for various types of transportation facilities are contained in the Caltrans Highway Design Manual (HDM). Corner sight distance refers to the line of sight between drivers stopped on a minor approach and drivers on the major road, similar to the sight lines resulting from application of the City's vision triangles. The HDM specifies different requirements for private roads, public streets, and signalized intersections. Critically, Section 405.1(2)(d) of the HDM explicitly states that corner sight distance requirements as described above are not applied to urban driveways unless signalized. The proposed project's parking garage access on Second Street would be considered an urban driveway, so would not be subject to corner sight distance requirements per Caltrans standards.

The proposed project would also implement safety features such as illuminated signs at the entrance of the parking garage which indicates an existing vehicle, convex mirrors to provide improved visibility of eastbound traffic while exiting the parking garage, and a stop sign or exit gate at the garage exit. Because of the foregoing, the proposed project would be expected to have a less than significant impact related to safety hazards, as it would not introduce hazards through either its design or operation.

**d) Emergency Access**

**Would the project: Result in inadequate emergency access?**

***Summary of DNSP EIR Findings***

The DNSP EIR states that the implementation of the DNSP is not anticipated to result in inadequate emergency access. Implementation of the DNSP would convert the one-way couplets in Downtown to two-way traffic, but this circulation modification would not adversely affect travel times of emergency vehicles. The City's Fire Code and Subdivision regulations contain detailed standards and mitigation requirements relating to dead-end streets and emergency vehicle access. The adequacy of emergency vehicle access would be evaluated for each individual development in the DNSP area. Considering that each individual development is expected to be consistent with the City's Fire Code, Subdivision, and other regulations in effect at the time, the DNSP would cause a less than significant impact on emergency access.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to emergency access presented in the DNSP EIR, and the conclusions regarding emergency access impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would include adequate emergency vehicle access to the project site. Emergency vehicles would be able to access the project site from the north, east, west, and south directly from the adjacent streets including Randolph Street, Franklin Street, Second Street, and Third Street. The site would have two access points, so should one access point be compromised during an emergency, responders would be able to use the other access point to enter the site. Fire engines would not have access to the parking garage but would instead park on the street adjacent to the site; however, the access driveway is sufficient to accommodate an emergency requiring response by an ambulance. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar emergency access effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

None.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Transportation, the proposed project would not result in new significant transportation impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant transportation impact. There is no new information of substantial importance showing that significant transportation impacts described in the DNSP EIR could be substantially reduced by adopting new or different mitigation measures or alternatives.

| Environmental Issue Area                                                                                                                                                                                                                                                            | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XVIII. Utilities and Service Systems</b><br><i>Would the project:</i>                                                                                                                                                                                                            |                              |                                                             |                                                         |                                                         |                                |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?                                                                                                                           | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| c) Result in a determination by the wastewater treatment                                                                                                                                                                                                                            | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                | DNSP EIR Determination       | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?                |                              |                                                             |                                                         |                                                         |                                |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |
| e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?                                                                      | Less than significant impact | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Water, Wastewater, and Stormwater Facilities

**Would the project:**     **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

#### *Summary of DNSP EIR Findings*

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP area would require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects, and determined there to be a less than significant impact in this regard.

#### *Water and Wastewater Treatment*

The DNSP EIR determined that the buildout of the DNSP would exceed the capacity of the existing wastewater system operated by the Napa Sanitation District (NapaSan). The DNSP EIR found that the NapaSan 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. Any new wastewater facilities would be required to comply with all federal, State, and local laws and regulations, as well as all applicable policies and actions related to wastewater facilities in the General Plan, therefore the DNSP EIR determined that impacts related to wastewater facilities would be less than significant.

#### *Stormwater Drainage*

The DNSP EIR determined that the DNSP would include project features, which would encourage infrastructure improvements to reduce stormwater runoff and water use.

#### *Electricity, Natural Gas, and Telecommunications*

The DNSP EIR found that PG&E is the main energy utility provider for the City and County and that the residential sector was the largest user of electricity in the County in 2003, with commercial use being the second largest. Downtown Napa is served by underground, three-phase primary electric lines.

The DNSP EIR found that there are no natural gas production wells in the County and that natural gas use has been decreasing.

The DNSP EIR found that Comcast and AT&T are the main providers of cable, phone, and internet services to the City. The DNSP EIR identified that neither provider expects continued growth within the DNSP area to exceed their system's existing capacity.



### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to utilities presented in the DNSP EIR, and the conclusions regarding utilities impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would connect to existing water, stormwater, wastewater, and telecommunications facilities beneath Franklin Street and Randolph Street, and would be served by existing electric power facilities. Although implementation of the DNSP could potentially exceed the capacity of the existing wastewater system operated by the NapaSan, development would be reviewed by the City on a project-by-project basis to ensure adequate wastewater facilities are available. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar water, wastewater treatment, stormwater or other facility effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

#### **b) Water Supply**

**Would the project:     Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated in the DNSP would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and determined there to be a less than significant impact in this regard. The DNSP EIR determined that the City would have adequate water supplies to meet demand during normal, dry, and multiple dry years with the implementation of long-term water conservation BMPs. NapaSan also proposed new additions to recycled water systems to reduce City demand. The DNSP EIR noted, however, that 50 percent of existing water pipes in the Downtown demand and distribution system would require upgrades because of the buildout of the DNSP. All new development in the DNSP would be required to comply with all applicable General Plan policies related to infrastructure improvements and would be required to pay its fair share of water system improvements. As such, the DNSP EIR determined a less than significant impact would occur related to water supply.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to utilities presented in the DNSP EIR, and the conclusions regarding utility impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project would connect to existing water supply infrastructure beneath Franklin Street and Randolph Street and would be required under the DNSP to pay its fair share of water system improvements. This, coupled with its compliance to all General Plan policies and actions related to water use, would reduce the proposed project's impacts on water supply to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar water supply effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### **c) Wastewater Treatment Capacity**

**Would the project:**     **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

### ***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would result in a determination by the wastewater treatment provider which serves or may serve the DNSP that it has adequate capacity to serve the DNSP's projected demand in addition to the provider's existing commitments and determined there would be a less than significant impact in this regard. The DNSP EIR determined that development facilitated by the DNSP may require investment in new or upgraded sanitary sewer infrastructure. The NapaSan 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 all applicable General Plan policies regarding the provision of public facilities. New development facilitated by the DNSP would be required to pay its fair share of wastewater system improvements as required by General Plan policies. The DNSP EIR determined 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 wastewater collection and distribution to a less than significant level.

### ***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to utilities presented in the DNSP EIR, and the conclusions regarding utilities impacts remain unchanged.

### ***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur

within the area previously evaluated in the DNSP EIR. The proposed project would connect to existing sanitary sewer lines beneath Franklin Street and Randolph Street and would be required under the DNSP to pay its fair share of wastewater system improvements. This, coupled with its compliance with all General Plan policies and actions related to wastewater management, would reduce the proposed project's impacts on wastewater systems to less than significant levels. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level. Therefore, the proposed project would not result in any peculiar wastewater treatment effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**d) Solid Waste Reduction Goals Consistency**

**Would the project:   Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would generate solid waste in excess of State or local standards, or in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and determined this impact would be less than significant. The DNSP EIR determined that population and commercial growth in the DNSP area would generate increased amounts of solid waste over the 20-year buildout 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 of in landfills serving the City. The DNSP EIR also noted that projects facilitated by the DNSP would generate construction and demolition (C&D) debris. Most projects would be required to comply with the City's C&D debris ordinance (Municipal Code Chapter 15.32) requiring diversion of 50 percent of such waste from landfill disposal. Given this fact and given the long-term capacity available at Keller Canyon Landfill through 2030, the DNSP would not result in landfills exceeding permitted capacities. As such, the DNSP EIR determined impacts related to the generation of solid waste would be less than significant.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to solid waste presented in the DNSP EIR, and the conclusions regarding solid waste impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project includes a mixed-use development consisting of commercial and hotel uses. The proposed project is consistent with the buildout projections of the DNSP EIR and thus would not generate solid waste in excess of State or

local standards or in excess of local infrastructure. Furthermore, the proposed project would adhere to applicable General Plan policies related to solid waste and waste diversion. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would have less than significant impacts. Therefore, the proposed project would not result in any peculiar solid waste capacity effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

**e) Solid Waste Regulations Consistency**

**Would the project: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

***Summary of DNSP EIR Findings***

The DNSP EIR evaluated whether full buildout of the development contemplated under the DNSP would comply with federal, State, and local management and reduction statutes and regulations to solid waste and determined there to be a less than significant impact in this regard. Chapter 15.32 of the City's Municipal Code mandates a 50 percent diversion rate for solid waste from landfill disposal. According to the DNSP EIR, implementation of the DNSP 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.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to solid waste presented in the DNSP EIR, and the conclusions regarding solid waste impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project consists of the construction of a mixed-use development containing hotel and commercial uses on an existing developed site. The project applicant would be required to comply with the requirements of federal, State, and local statutes and regulations related to solid waste. The proposed project would be required to adhere to all State and local waste diversion requirements. As such, impacts associated with the development of the proposed project within the DNSP Planning Area would be consistent with the analysis in the DNSP EIR and the proposed project would have less than significant impacts. Therefore, the proposed project would not result in any peculiar solid waste management or reduction effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

None.

## Conclusion

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Utilities and Service Systems, the proposed project would not result in new significant utility impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant utility impacts. There is no new information of substantial importance related to utility impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                                                       | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| <b>XIX. Wildfire</b><br><i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>                                                |                        |                                                             |                                                         |                                                         |                                |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?                                                                                                                       | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?   | No impact              | No                                                          | No                                                      | No                                                      | None                           |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result | No impact              | No                                                          | No                                                      | No                                                      | None                           |

| Environmental Issue Area                                                                                                                                                                | DNSP EIR Determination | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------|
| in temporary or ongoing impacts to the environment?                                                                                                                                     |                        |                                                             |                                                         |                                                         |                                |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | No impact              | No                                                          | No                                                      | No                                                      | None                           |

## Discussion

### a) Emergency Response/Evacuation Plan Consistency

**Would the project:** If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, substantially impair an adopted emergency response plan or emergency evacuation plan?

#### *Summary of DNSP EIR Findings*

The DNSP EIR determined that no impact would occur related to emergency response plan or emergency evacuation plan consistency due to the implementation of the DNSP. The Planning Area is outside of any State Responsibility Area (SRA) or land classified as FHSZ, and the buildout of the DNSP would comply with all emergency vehicle access requirements as a condition of development. Overall, the DNSP would not impede an established emergency access route or interfere with emergency response requirements and would not result in permanent road closures. Therefore, the DNSP would have no impact on emergency response or evacuation plans.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to wildfires presented in the DNSP EIR, and the conclusions regarding wildfire impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is not within an SRA or land classified as a Fire Hazard Severity Zone (FHSZ).<sup>66</sup> Construction of the proposed project would not result in any permanent road closures and adequate fire access would be provided on the project site. The proposed project would not result in any peculiar emergency response and evacuation effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**b) Expose Project Occupants to Pollutant Concentrations from Wildfire**

**Would the project:** **If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

***Summary of DNSP EIR Findings***

The DNSP EIR determined that no impact would occur related to emergency response plan or emergency evacuation plan consistency due to the implementation of the DNSP. The Planning Area is outside of any SRA or land classified as FHSZ; as such, the DNSP EIR determined that no impacts would occur.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to wildfires presented in the DNSP EIR, and the conclusions regarding wildfire impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the DNSP Planning Area and therefore is not within an SRA or land classified as an FHSZ. The proposed project would not result in any peculiar wildfire pollutant effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with

<sup>66</sup> California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zone Viewer. Website: <https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>. Accessed April 2, 2026.



the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**c) Infrastructure that Exacerbates Fire Risk**

**Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

***Summary of DNSP EIR Findings***

The DNSP EIR determined that no impact would occur related to emergency response plan or emergency evacuation plan consistency due to the implementation of the DNSP. The Planning Area is outside of any SRA or land classified as FHSZ. All construction that might be associated with the DNSP would be required to adhere to Building Fire Codes that are designed to minimize the potential for uncontrolled fires; as such, the DNSP EIR determined that no impacts would occur.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to wildfires presented in the DNSP EIR, and the conclusions regarding wildfire impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the DNSP Planning Area and therefore is not within an SRA or land classified as an FHSZ. The proposed project would not result in any peculiar, exacerbated fire effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

**d) Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes**

**Would the project:** If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

***Summary of DNSP EIR Findings***

The DNSP EIR determined that no impact would occur related to emergency response plan or emergency evacuation plan consistency due to the implementation of the DNSP. The Planning Area is outside of any SRA or land classified as FHSZ; as such, the DNSP EIR determined that no impacts would occur.

***Summary of 2018 Addendum***

The 2018 Addendum does not include any changes to the analysis related to wildfires presented in the DNSP EIR, and the conclusions regarding wildfire impacts remain unchanged.

***Proposed Project Analysis and Conclusions***

The analysis under the DNSP EIR remains accurate with respect to the proposed project, which would be developed with mixed uses in accordance with the provisions of the DNSP and would occur within the area previously evaluated in the DNSP EIR. The proposed project is within the DNSP Planning Area, and therefore is not within an SRA or land classified as an FHSZ. The proposed project would not result in any peculiar post-fire flooding or landslide effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR, and the proposed project would not result in any impacts that would not be mitigated to a less than significant level.

## **Relevant DNSP EIR Mitigation Measures**

None.

## **Conclusion**

The proposed project is within the scope of the DNSP development program evaluated in the DNSP EIR. With regard to Wildfire, the proposed project would not result in new significant Wildfire impacts that were not evaluated in the DNSP EIR. The proposed project would not result in an increase in the severity of a previously identified significant Wildfire impact. There is no new information of substantial importance related to Wildfire impacts. The conclusions from the DNSP EIR remain unchanged when considering the implementation of the proposed project.

| Environmental Issue Area                                                                                                                                                                                                                                                                                                                                                                                                                                                              | DNSP EIR Determination                     | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------------------------------------|
| <b>XX. Mandatory Findings of Significance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                            |                                                             |                                                         |                                                         |                                                                                            |
| a) Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | Discussed in topical sections of DNSP EIR. | No                                                          | No                                                      | No                                                      | MM 4.B-1, MM 4.B-2, MM 4.B-4, MM 4.B-5, MM 4.D-1, MM 4.D-2a, MM 4.D-2b, MM 4.D-3, MM 4.D-4 |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively                                                                                                                                                                                                                                                                                                                                                                         | Discussed in topical sections of DNSP EIR  | No                                                          | No                                                      | No                                                      | MM 4.B-1, MM 4.B-2, MM 4.B-4, MM 4.B-5                                                     |

| Environmental Issue Area                                                                                                                                                                                                         | DNSP EIR Determination                    | Do the Proposed Changes Involve New or More Severe Impacts? | New Circumstances Involving New or More Severe Impacts? | New Information Requiring New Analysis or Verification? | Applicable Mitigation Measures                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? |                                           |                                                             |                                                         |                                                         |                                                                                                                                                                                          |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                     | Discussed in topical sections of DNSP EIR | No                                                          | No                                                      | No                                                      | MM 4.B-1,<br>MM 4.B-2,<br>MM 4.B-4,<br>MM 4.B-5,<br>MM 4.C-1b,<br>MM 4.C-1c,<br>MM 4.D-1,<br>MM 4.D-2a,<br>MM 4.D-2b,<br>MM 4.D-3,<br>MM 4.D-4,<br>MM 4.I-1a,<br>MM 4.I-1b,<br>MM 4.I-1c |

## Discussion

### a) Potential Degradation to Environment and Examples of California History or Prehistory

**Does the project:**      **Have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

As described in detail herein and in the attached appendices, project-level analysis determined that no new or more severe impacts would occur as a result of the proposed project, and no new mitigation would be required beyond those applicable measures already identified in the DNSP EIR. These impacts were already accounted for in the DNSP EIR and are therefore not a peculiar or more severe impact. All project-specific biological resources impacts were found to be less than significant with implementation of MM 4.B-1 through MM 4.B-6. The DNSP EIR also determined that any impacts related to important disruption of examples of the major periods of California history or prehistory would be less than significant with implementation of MM 4.D-1, MM 4.D-2a, MM 4.D-2b, MM 4.D-3, and MM 4.D-4. The proposed project would comply with all applicable biological and historical resources mitigation measures and would therefore not 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, reduce the number or restrict the range of a rare or endangered plant or animal community, or eliminate important examples of the major periods of California history or prehistory.

The proposed project is within the development assumptions analyzed by the DNSP EIR and therefore would not result in any new or more severe impacts. The conclusions of the DNSP EIR would remain unchanged. As such, the mitigation measures included within this Addendum would mitigate all potential project impacts to a less than significant level or to a level consistent with the findings of the DNSP EIR. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### b) Cumulatively Considerable Impacts

**Does the project:**      **Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Potential cumulative impacts were thoroughly addressed in the DNSP EIR. As discussed in this Addendum, the proposed project would not result in any additional or more severe impacts than

previously disclosed in the certified EIR. Accordingly, the proposed project does not require any revisions to the cumulative analysis in the DNSP EIR.

The DNSP EIR identified significant and unavoidable cumulative impacts related to transportation, air quality, consistency with the Bay Area 2010 Clean Air Plan, GHG emissions, and conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. According to the DNSP EIR, these impacts would be mitigated through implementation of MM 4.B-1 through MM 4.B-5 and MM 4.L-1a through MM 4.L-6. MM 4.L-1a through MM 4.L-6 are not applicable to the proposed project as they relate to the installation of a traffic signal at the intersection of SR-29 northbound off-ramp/First Street and developments under the DNSP that would generate substantial multimodal trips crossing at-grade railroad crossings. Cumulatively significant impacts would still be present through the buildout of the DNSP even with mitigation, but implementation of the applicable measures listed above would reduce project-level impacts to less than significant levels.

The proposed project would not result in any peculiar effects and would not result in any new or more severe impacts that were not previously identified in the DNSP EIR. The proposed project would comply with all applicable mitigation measures required to implement the DNSP to reduce impacts related to development within the site to the greatest extent feasible, including MM 4.B-1 through MM 4.B-6. All other cumulative impacts and the proposed project's incremental contribution to such less than significant impacts would be reduced to less than significant levels through compliance with mitigation measures identified by the DNSP EIR. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR. The proposed project is consistent with the development assumptions in the DNSP EIR and therefore would not result in any peculiar cumulative effects and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

### **c) Adverse Effects on Human Beings?**

**Does the project:**      **Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

As described in detail herein and in the attached appendices, the proposed project would be consistent with the proposed development assumptions contained within the DNSP EIR and would benefit the City by providing increased housing options. The preceding sections of this Addendum discuss the various impacts that could have adverse effects on human beings, such as air quality, GHG emissions, hazardous materials, hydrology and water quality, and noise, compared to the findings of the DNSP EIR. All impacts identified in this document have been determined consistent with or less severe than the impacts identified in the DNSP EIR through the implementation of applicable mitigation measures including MM 4.B-1 through MM 4.B-6, MM 4.C-1b, MM 4.C-1c, MM 4.D-1 through MM 4.D-4, MM 4.I-1a through MM 4.I-1c, and incorporation of project design features. As such, impacts associated with the development of the proposed project would be consistent with the analysis in the DNSP EIR. Therefore, the proposed project would not result in any peculiar effects on human beings and would not result in a new or more severe adverse impact that was not previously identified in the DNSP EIR.

## **Relevant DNSP EIR Mitigation Measures**

Implement MM 4.B-1, MM 4.B-2, MM 4.B-3, MM 4.B-4, MM 4.B-5, MM 4.C-1b, MM 4.C-1c, MM 4.D-1, MM 4.D-2a, MM 4.D-2b, MM 4.D-3, MM 4.D-4, MM 4.I-1a, MM 4.I-1b, and MM 4.I-1c.

## **Conclusion**

With regard to Mandatory Findings of Significance, there is no new information of substantial importance, change in the proposed project, or change in circumstances in which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to mandatory findings. The proposed project is within the scope of the DNSP EIR, the DNSP EIR adequately describes the proposed project for purposes of CEQA and the conclusions from the DNSP EIR remain unchanged when considering the adoption of the proposed project.

## Franklin Station Project

## Addendum

## 4 - Conclusions

Based on this Addendum, the City hereby makes the following determinations regarding the proposed project:

- As explained in detail below, because the project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified, the proposed project would be eligible for a more limited environmental review available under CEQA Guidelines Section 15183. Although both CEQA Guidelines Sections 15168 and 15183 apply to the proposed project, the analysis above focuses on Section 15168.
- Based on the analyses and conclusions in Section 3 of this Addendum, and pursuant to Sections 15168(c) and 15162(a) of the CEQA Guidelines, the City has determined that the proposed project will not have any new significant environmental effects that were not identified and addressed in the DNSP EIR, or result in a substantial increase in the severity of any previously identified effects, and the City is not aware of any new information of substantial importance within the meaning of CEQA Guidelines Section 15162(a)(3). Therefore, the City hereby determines that no additional environmental review is necessary and no new environmental document is required.
- As explained in detail below, the proposed project is exempt from further environmental review because it is an “infill development project” under Section 15332 of the CEQA Guidelines.

### 4.1 - Section 15183 Exemption for General Plan Consistency

Separate and apart from the addendum process, the proposed project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified. Therefore, the project is eligible for exemption available under Section 15183 of the CEQA Guidelines which states that “CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.”

The 2040 General Plan Update recognized and supported the land use designations, planning and implementation of the DNSP. The proposed project is consistent with the policies included in the General Plan for development in the DNSP. It is located within the Downtown II Building Form Zone of the DNSP and is consistent with the DMU land use designation, which allows hospitality, hotels, residential and retail uses. The proposed project would be developed at a maximum FAR of 4.0, which is consistent with the requirements for the project site. As such, the proposed project is consistent with the development density established by existing zoning and general plan policies for which the 2040 General Plan Update EIR (SCH No. 2021010255) was certified on October 4, 2022.



The 2040 General Plan Update EIR recognized the impacts evaluated in the DNSP EIR and provided updated growth projections for the entire City of Napa through 2040. For the reasons explained in this Addendum, the impacts from the proposed project are also within and less than the impacts analyzed for the 2040 General Plan Update program. As a result, if the City applied the exemption available under Section 15183, it would similarly conclude that the proposed project is within the scope of the 2040 General Plan Update EIR impact evaluation, the 2040 General Plan Update EIR adequately describes the proposed project's impacts for purposes of CEQA and that there are no project-specific significant effects that are peculiar to the project or its site and, therefore, no further CEQA documentation is required. As explained above, however, the City elected to perform the more comprehensive environmental review described in Sections 15162(a) and 15168(c) of the CEQA Guidelines. Accordingly, the City could also determine that no additional environmental review is required under Section 15183 of the CEQA Guidelines and that the project is statutorily exempt from further review.

## **4.2 - Infill Development Project, Class 32 Categorical Exemption**

Separate and apart from the determination that the proposed project is appropriately evaluated pursuant to an Addendum, the proposed project is also independently exempt from the provisions of CEQA requiring environmental review under Public Resources Code Section 21084 because qualifies for a categorical exemption. The proposed project is exempt from CEQA under the Class 32 Exemption (CEQA Guideline § 15332, Infill Development Projects) as infill development meeting the following conditions, as detailed below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.**

The proposed project is consistent with the land use designations and policies included in the General Plan. It is located within the Downtown II Building Form Zone of the DNSP and is consistent with the DMU land use designation, which allows hospitality, hotels, residential and retail uses.

- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The proposed project site is on less than 5 acres and is wholly within the city limits, surrounded by commercial, retail and public service uses and designations in Downtown.

- (c) The project site has no value as habitat for endangered, rare or threatened species.**

The site is a fully developed site. No special-status plant species have potential to occur in the project site and no sensitive plant communities exist on the project site. No HCP, NCCP, or other approved local, regional, or State HCP occurs on or in the area of the project site. The

proposed project avoids development impacting Napa Creek, Napa River, and any potential wetlands as it is approximately 0.22 mile away.

**(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

As explained in Section 3, the proposed project would not have any new significant effects relating to traffic, noise, air quality, or water quality.

**(e) The site can be adequately served by all required utilities and public services.**

The project site can be adequately served via adjacent existing services. The project site has electrical, water, sanitary sewer and other services and utilities located in Downtown within or adjacent the site.

### 4.2.1 - Exceptions to Categorical Exemptions

Pursuant to the CEQA Guidelines, the Class 32 Exemption applies so long as an “Exception” set forth in Section 15300.2 does not disqualify the Exemption.

The proposed project qualifies for the Class 32 Categorical Exemption unless one of the exceptions set forth in CEQA Guidelines Section 15300.2 applies. The proposed project does not meet the criteria for any of these exceptions, as detailed below:

- (a) **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.

The location exception applies only to Classes 3, 4, 5, 6, and 11 exemptions. Because the proposed project relies on the Class 32 Exemption, this exception does not apply.

- (b) **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

There is no evidence of a pattern of successive projects of the same type in the same place that would result in a significant cumulative impact. Construction timing of the nearby First Street Phase II Project will be completed before commencement of construction of the proposed project, so there will be no overlap in construction timing. As a result, there will be no combined construction-period air quality impacts from the two projects. In addition, there are no future projects of similar magnitude that are reasonably foreseeable within the vicinity of the project site. The project site is in an already urbanized Downtown area, and the proposed project’s infill redevelopment would not contribute to cumulatively considerable operational impacts. Therefore, this exception does not apply.

- (c) **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The proposed project site is fully developed and located in an urbanized Downtown setting surrounded by existing commercial and mixed-use development. The proposed infill development is consistent with the type, scale, and character of development in the surrounding area and does not present unusual circumstances. The proposed project does not include features that are atypical for the site or vicinity, such as substantial new infrastructure, unusual operational characteristics, or development in a sensitive or undeveloped location. Because the project is consistent with the existing environmental setting and does not present unusual circumstances, there is no reasonable possibility that it would result in a significant environmental effect due to unusual circumstances. Therefore, this exception does not apply.

- (d) **Scenic Highways.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway. This does not apply to improvements which are required as mitigation by an adopted ND or certified EIR.

There are no officially designated state scenic highways in the proposed project vicinity. The proposed project therefore would not damage scenic resources within a State Scenic Highway corridor, and this exception does not apply.

- (e) **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Although the project site was formerly associated with a LUST case, the fuel oil cleanup was completed and the case was closed in 1995. The project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there are no known active underground storage tanks on the site. Accordingly, this exception does not apply.

- (f) **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The proposed project includes the restoration and rehabilitation of the Franklin Station Post Office building, which is a designated Local Landmark. The work will be undertaken in accordance with the Preservation Covenant for the project site, the Secretary of the Interior's Standards for the Treatment of Historic Properties, and the site-specific Historic Design Guidelines adopted by City Council Resolution No. R2018-134. Because the proposed project must comply with these preservation standards, it would not cause a substantial adverse change in the significance of a historical resource, and this exception does not apply.

As demonstrated in the analysis above, no such disqualifying exception applies to the proposed project and therefore the proposed project is categorically exempt from CEQA under the Class 32 Exemption.