ADDENDUM TO THE INITIAL STUDY/ADDENDUM FOR THE FIRST AND OXBOW GATEWAY PROJECT AND THE DOWNTOWN NAPA SPECIFIC PLAN PROGRAM EIR (SCH #2010042043)

Section 1.0 Purpose of the Addendum

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is certified and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document.

In May 2012, the City of Napa City Council certified the Downtown Napa Specific Plan (DNSP) Program EIR (SCH# 2010042043) by Resolution No. R2012-54 to address future development under the DNSP. In November 2020, the City of Napa prepared an Initial Study/Addendum to the Downtown Napa Specific Plan Program (DNSP) Environmental Impact Report (EIR) (SCH# 2010042043) for a proposed hotel development consisting of two, four-story hotel buildings (184,106 square feet) with 74 hotel rooms and 6,294 square feet of ground floor retail (First and Oxbow Gateway Project; File Number 16-0124). On November 17, 2020, the City Council adopted a resolution approving a use permit, design review permit and certificate of appropriateness for the project and determining that the that the potential environmental impacts of the hotel project, including the removal of the Local Landmark structures from 718 Water Street and 731 First Street, were adequately analyzed and addressed in the DNSP EIR and that no further environmental review is required pursuant to CEQA Guidelines Sections 15162, 15164, and 15168.

Following approval of the project in 2020, the Applicant filed a new application proposing changes to the approved project, including increasing the number of hotel rooms from 74 to 123 and eliminating the 6,294 square feet of ground floor retail. The purpose of this Addendum is to document any changes to the approved 2020 project and evaluate whether the changes would result in a new or more significant environmental impact compared to what was previously disclosed in the 2020 Addendum.

The CEQA Guidelines Section 15162 states that when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determined, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or 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 the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines Section 15164 states that the Lead Agency or a 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 15162 (see above) calling for preparation of a subsequent EIR have occurred.

Given the revised project description and conditions of the project site, site-specific environmental review, and environmental review prepared for the 2020 Addendum referenced above, the City has concluded that the revised project would not result in any new impacts not previously disclosed in the Downtown Napa Specific Plan Program EIR and the 2020 Addendum; nor would it result in a substantial increase in the magnitude of any significant environmental impact previously identified

in the Addendum. For these reasons, a supplemental or subsequent EIR is not required and an Addendum has been prepared for the revised project.

This Addendum, which is to be considered together with the 2020 Addendum prepared for the project, will not be formally circulated for public review, but will be considered by the City Council along with the DNSP Final EIR prior to making a decision on the revised project, pursuant to CEQA Guidelines Section 15164(d).

Section 2.0 Description of the Project

2.1 Summary of the Approved Project

In November 2020, the City of Napa prepared an Initial Study/Addendum to the Downtown Napa Specific Plan Program Environmental Impact Report (EIR) (SCH# 2010042043) for a proposed hotel development consisting of two, four-story hotel buildings (184,106 square feet) with 74 hotel rooms and 6,294 square feet of ground floor retail, 5,754 square feet of conference and meeting space, and 121 parking spaces in a two-level below grade parking garage (First and Oxbow Gateway Project; File Number 16-0124). The project received the following approvals:

- Use Permit authorizing a hotel use in the Oxbow Commercial District,
- Design Review Permit for a 74-room hotel consisting of two, four-story buildings totaling 184,106 square feet,
- Certificate of Appropriateness to relocate two Landmark structures from 718 Water Street and 731 First Street to 58 Randolph Street, and
- Right-of-way Abandonment for a portion of the Water Street right-of-way between Soscol Avenue and McKinstry Street and for the Lawrence Street right-of-way between First Street and the Water Street right-of-way.

The approved project would also require administrative approval of a Lot Line Adjustment/Merger to combine all parcels on the west side of the railroad into a single parcel and all parcels on the east side of the railroad into a single parcel following approval of the Right-of-way Abandonment.

2.2 Proposed Changes to the Approved Project

The modified project proposes to increase the number of hotel rooms from 74 to 123 and eliminate the 6,294 square feet of ground floor retail. The project would provide 154 parking spaces in a one-level below-grade parking garage. The project would utilize mechanic parking stackers. A summary of the modifications to the approved project are provided in Table 2.2-1 below.

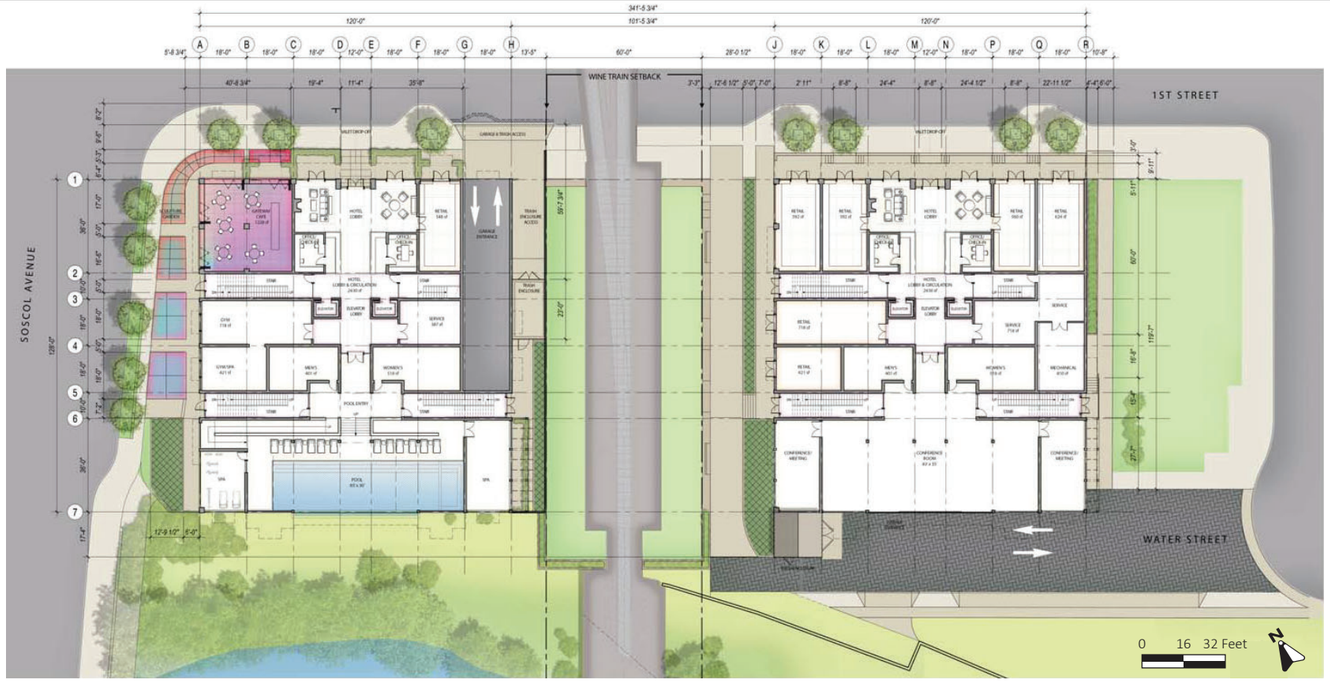
Table 2.2-1: Summary of Changes to the Approved 2020 Project

	Approved 2020 Project	Modified Project	Change
Hotel Rooms	74	123	49
Retail (square feet)	6,294	0	(6,294)
Meeting and Conference Space	5,754	3,375	(2,199)
Parking Spaces	121	154	33
Building Height (feet)	60	60	--
Building Size (square feet)	184,106	151,224	-32,882

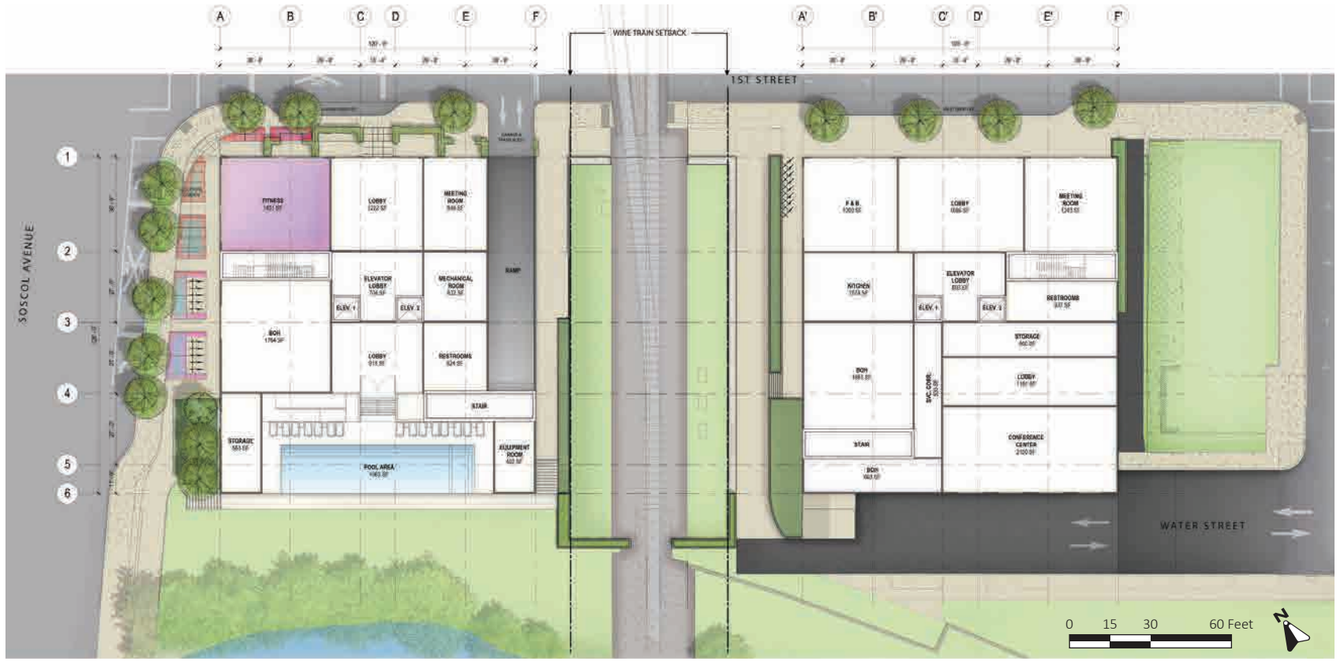
Figures depicting the approved vs. proposed conceptual site plan, building elevations, and parking garage plan are provided in Figure 2.2-1 through Figure 2.2-7.

2.2.1 Flood Wall

Since approval of the project, the applicant has entered into an agreement with the Napa County Flood Control District to implement a flood control improvement project along the southern edge of Water Street, as shown on Figure 2.2-8. As part of the project, the applicant would construct an approximately 105-foot-long landscape wall that would be one foot above the finished sidewalk grade and provide one foot of freeboard for flood protection. The proposed gravity stack wall would require minimal construction equipment and would take approximately five days to construct.



2020 APPROVED SITE PLAN



MODIFIED SITE PLAN

2020 APPROVED VS. MODIFIED CONCEPTUAL SITE PLAN (GROUND FLOOR) | FIGURE 2.2-1

2020 APPROVED SITE PLAN

MODIFIED SITE PLAN

2020 APPROVED VS. MODIFIED CONCEPTUAL SITE PLAN (SECOND FLOOR) | FIGURE 2.2-2

2020 APPROVED SOUTH ELEVATION

MODIFIED SOUTH ELEVATION

2020 APPROVED VS. MODIFIED BUILDING ELEVATION (SOUTH) | FIGURE 2.2-3

2020 APPROVED EAST ELEVATION

MODIFIED EAST ELEVATION

2020 APPROVED VS. MODIFIED BUILDING ELEVATION (EAST) | FIGURE 2.2-4

2020 APPROVED NORTH ELEVATION

MODIFIED NORTH ELEVATION

2020 APPROVED VS. MODIFIED BUILDING ELEVATION (NORTH) | FIGURE 2.2-5

2020 APPROVED WEST ELEVATION

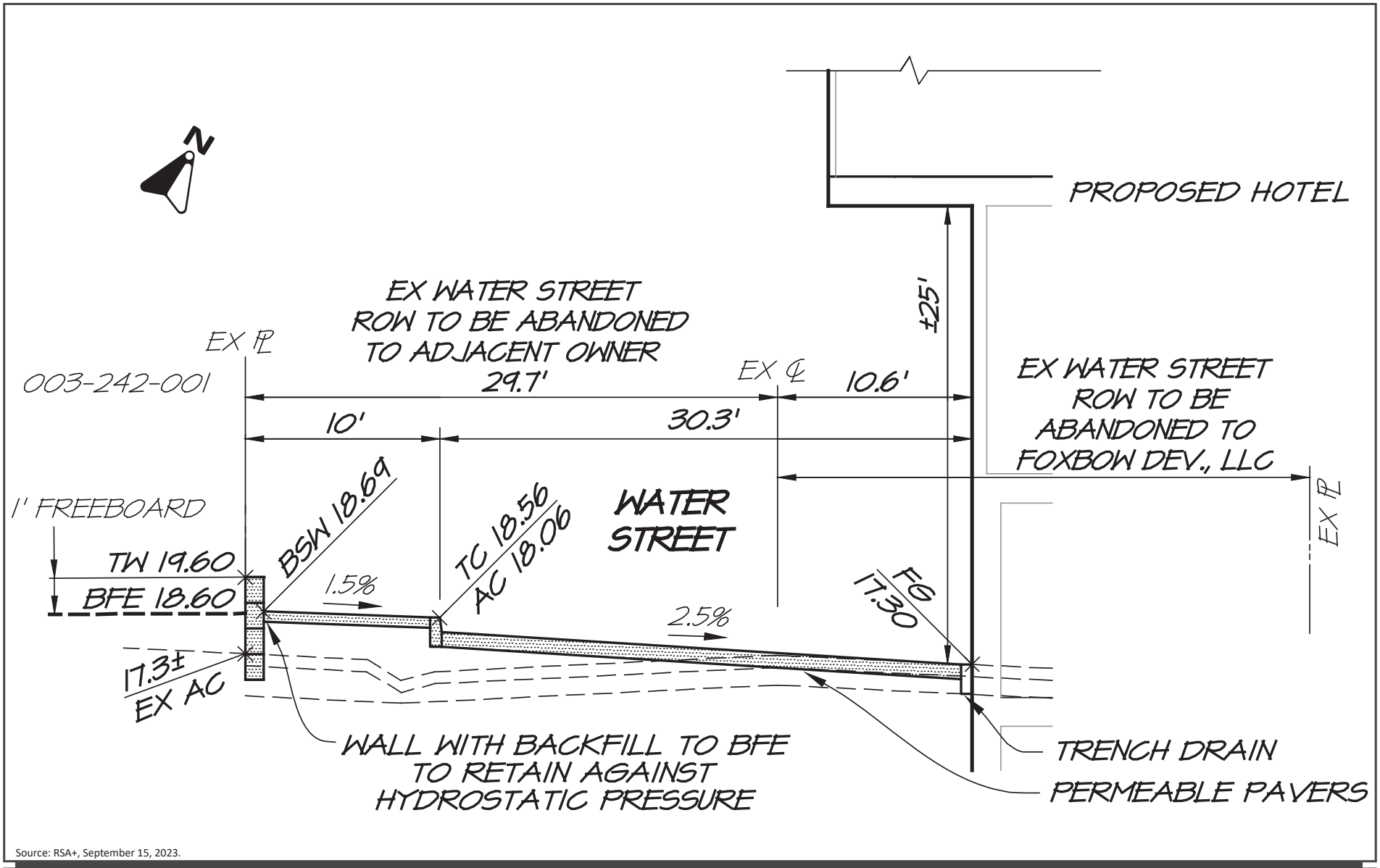
MODIFIED WEST ELEVATION

2020 APPROVED VS. MODIFIED BUILDING ELEVATION (WEST) | FIGURE 2.2-6

2020 APPROVED PARKING PLAN

MODIFIED PARKING PLAN

2020 APPROVED VS. MODIFIED PARKING PLAN | FIGURE 2.2-7



Source: RSA+, September 15, 2023.

PROPOSED FLOOD WALL CROSS-SECTION | FIGURE 2.2-8

Section 3.0 Setting and Environmental Impact Discussion

In accordance with CEQA Section 21093(b) and CEQA Guidelines Section 15152(a), this Addendum tiers off the previously certified Downtown Napa Specific Plan Program (DNSP) Environmental Impact Report (EIR) (SCH# 2010042043) and the 2020 Initial Study/Addendum for the First and Oxbow Gateway Project (File Number 16-0124).

The discussion below describes the environmental impacts of the 2020 approved project, changes that have occurred in the environmental setting, and any resulting new impacts or impacts of greater severity than those identified in the 2020 Addendum and previously certified EIR. This Addendum only addresses those resource areas that would be affected by the proposed changes to the approved project (i.e., 49 additional hotel rooms). The increase in the number of hotel rooms on the site may impact the following resource areas which are discussed in greater detail in this Addendum:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Noise and Vibration
- Transportation
- Utilities and Service Systems

The conditions in the area around the project site remained relatively unchanged. As a result, new or more severe impacts on biological resources, cultural resources, and hydrology/water quality would not occur, because the project would not affect more natural habitat or disturb more land area.

The location of development would remain unchanged, therefore, the impacts associated with agriculture, hazards and hazardous materials, land use, mineral resources, public services, tribal cultural resources, utilities, or wildfire would remain the same as those in the approved 2020 Addendum. These impacts would be comparable to the approved project because they are primarily related to the project site, design, and uses which remain unchanged.

Lastly, all mitigation measures, regulatory requirements, and conditions of approval identified in the 2020 Addendum are still required to be implemented and are incorporated here by reference. Therefore, as stated above, the impacts to the following resource areas would not change from the approved 2020 Addendum:

- Agricultural Resources
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

3.1 Aesthetics

The existing visual character and views of the site and surrounding area have not changed since the approval of the 2020 Addendum. The approved 2020 project proposed to relocate two historic structures, demolish four existing non-historic structures, and construct two, four-story hotel buildings (184,106 square feet[1]) with 74 hotel rooms, 6,294 square feet of ground floor retail, 5,754 square feet of conference and meeting space, and 121 parking spaces in a two-level below grade parking garage. The historic structures on-site include a single-family residence and one-story commercial building that were approved for relocation to 58 Randolph Street, approximately one mile south of the project site. The approved project proposed buildings up to 60 feet in height. As such, the 2020 Addendum analysis focused on the visual change associated with two, four-story hotel buildings with two levels of below-grade parking. The 2020 Addendum concluded that with adherence to the standards and design guidelines found in the DNSP, along with the City's Downtown Specific Plan Design Guidelines and Historic Guidelines, the approved project would result in less than significant impacts to visual and aesthetic resources.

The modified project would increase the number of hotel rooms from 74 to 123 and eliminate the 6,294 square feet of ground floor retail. The project would provide 33 additional parking spaces (total of 154) in one level of below-grade parking. The overall mass of the building (i.e., building height and square footage) would be slightly reduced from the approved project due to the proposed step back design of the West Building (refer to Figure 2.2-3 through Figure 2.2-6). The revised project would be required to adhere to the massing and scale design guidelines, as listed in the *Specific Plan Policies and Design Standards* of the DNSP. With conformance to the applicable policies, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.2 Air Quality

The existing air quality setting has not changed substantially since the preparation of the 2020 Addendum. The 2020 Addendum concluded that the approved project would be consistent with the Bay Area 2017 Clean Air Plan. Construction emissions generated by the approved project would be below Bay Area Air Quality Management District (BAAQMD) thresholds. Further, the 2020 approved project would implement BAAQMD Best Management Practices for construction dust to ensure implementation of DNSP Mitigation Measure 4.B-2 and reduce the contribution of construction dust to health risks. The approved project was also conditioned to develop a plan that would achieve a fleet-wide average 84-percent reduction in DPM exhaust emissions or greater. The proposed 74 hotel rooms in the approved project would be below the BAAQMD threshold screening size of 489 rooms for a hotel and therefore the project's operational emissions would be less than significant.

The modified project would involve similar amounts of construction activities in terms of equipment usage and diesel exhaust. Because construction would occur several years further in the future, the

[1] Including the two levels of below grade parking.

construction equipment, truck and worker traffic fleet would be more modern and have lower emissions. Table 3.2-1 below provides a comparison of the emissions between the approved 2020 project and the modified project.[2]

Table 3.2-1: Construction Period Emissions Comparison

Scenario	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Approved 2020 Project emissions (tons)	0.77 tons	2.62 tons	0.13 tons	0.12 tons
Modified Project emissions (tons)	0.89 tons	2.38 tons	0.10 tons	0.09 tons
Modified Project Average daily emissions (pounds)[1]	**5.55 lbs./day**	**14.83 lbs./day**	**0.61 lbs./day**	**0.57 lbs./day**
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:

1. Assumes 321 workdays.

As shown in Table 3.2-1, the modified project would result in slightly lower temporary construction emissions, with the exception of reactive organic gases (ROG). The modified project's construction period emissions (including the proposed floodwall) would be below the applicable BAAQMD thresholds. Consistent with the findings of the DNSP EIR and Mitigation Measure 4.B-2, the project would implement BAAQMD recommended best management practices to control fugitive dust during project construction. Therefore, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

The modified project would continue to fall below BAAQMD's operational-related criteria air pollutant screening level (489 rooms) and would therefore not result in new or greater impacts than disclosed in the 2020 Addendum.

As shown in Table 3.2-1 above, the modified project's construction period emissions of exhaust PM_{10} and $PM_{2.5}$ would be less than the approved 2020 project. Therefore, health risks would proportionally decrease. Lower predicted emissions are mostly due to the later construction start date where the construction equipment used is modeled to include equipment with lower emissions. Consistent with Mitigation Measure 4.B-2 and the approved 2020 project, the modified project would be required as a condition of approval to develop a plan demonstrating that the off-

[2] Note that the details of the proposed floodwall were not available at the time the modified project's emissions were modeled. It is anticipated that the proposed floodwall would be constructed over a period of one week. It is assumed that diesel construction equipment would be minimal and that the wall would be constructed manually. A small plate compactor and a few truckloads of drain rock and blocks would be required. Emissions would include those from intermittent operation of a plate compactor and backhoe for one week, a few construction truck trips, and worker traffic. This activity would have a negligible effect on criteria air pollutant emissions, as emissions would increase by less than one pound per day over the construction period.

road equipment used on-site to construct the project would achieve a fleet-wide average 84-percent reduction in DPM exhaust emissions or greater. Therefore, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.3 Greenhouse Gas Emissions

On April 20, 2022, the BAAQMD Board of Directors adopted the *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*. The report includes BAAQMD's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG threshold replaces the GHG thresholds set forth in the May 2017 BAAQMD CEQA Air Quality Guidelines. BAAQMD has analyzed what will be required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045. Per CEQA Guidelines Section 15088.5, adoption of new policies and/or regulations is not considered substantial new information requiring recirculation of the EIR because it does not result in a new significant environmental impact, increase the severity of an environmental impact, or alter an existing mitigation measure or alternative.

The 2020 Addendum concluded that implementation of the approved project would contribute to the significant unavoidable GHG emissions impact identified in the DNSP EIR. Consistent with DNSP EIR Mitigation Measures 4.B-5, the project would be required to prepare a GHG Reduction Plan that includes the proper elements to reduce emissions from the project below 660 MT of CO_{2e} annually. With implementation of the condition of approval, the project's GHG emissions would be reduced but still contribute to a significant unavoidable impact.

The modified project would result in higher GHG emissions since there are more hotel rooms, thus more project users.[3] A comparison of the approved 2020 and modified project's GHG emissions is provided in Table 3.3-1 below.

[3] The California Emissions Estimator (CalEEMod) model was used to emissions for 2030.

Table 3.3-1: GHG Emissions Comparison

Source Category	Approved 2020 Project	Modified Project
Area	<1	<1
Energy Consumption	312	424
Mobile	488	514
Solid Waste Generation	23	34
Water Usage	3	4
Total (MT CO_{2e}/year)	**827**	**977**
Bright-line 2030 Threshold	*660 MT CO_{2e}*	*660 MT CO_{2e}*
Significant?	***Yes***	***Yes***

Consistent with the approved 2020 project, the modified project would be required to prepare a GHG Reduction Plan that includes the proper elements to reduce emissions from the project below 660 MT of CO_{2e} annually. Elements of this plan may include, but would not be limited to, the following:

- Install solar power systems or other renewable electric generating systems that provide electricity to power on-site equipment and possibly provide excess electric power;
- Install efficient space and water heating systems;
- Develop and implement a transportation demand management (TDM) program to further reduce mobile GHG emissions.
- Construct on-site or fund off-site carbon sequestration projects (such as a forestry or wetlands projects for which inventory and reporting protocols have been adopted). If the project develops an off-site project, it must be registered with the Climate Action Reserve or otherwise approved by the BAAQMD in order to be used to offset Project emissions;
- Purchase carbon credits to offset Project annual emissions. Carbon offset credits must be verified and registered with The Climate Registry, the Climate Action Reserve, or another source approved by the California Air Resources Board or BAAQMD. The preference for offset carbon credit purchases include those that can be achieved as follows: 1) within the City; 2) within the San Francisco Bay Area Air Basin; 3) within the State of California; then 4) elsewhere in the United States. Provisions of evidence of payments, and funding of an escrow-type account or endowment fund would be overseen by the City.

With implementation of the GHG Reduction Plan, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.4 Noise and Vibration

The existing noise and vibration setting has not changed substantially since the preparation of the 2020 Addendum. The 2020 Addendum concluded that the approved project would result in short-term increase in noise levels in the project area during demolition and construction activities. The approved project would be required to implement mitigation measures included in the General Plan (HS-9.1, -9.6, -9.9 to -9.12, and -9.14) and DNSP (4.I-1a, 4-I-1b, 4.I-1c, 4.I-3) to reduce potential construction noise impacts to less than significant. Operational noise from the approved project (including parking lot noise, mechanical equipment noise, and traffic-related noise) was determined to be within acceptable noise exposure levels per the Napa General Plan. Therefore, the approved project would have a less than significant operational noise impact.

The modified project would entail less excavation than the 2020 approved project since it now proposes only one level of below-grade parking; therefore, noise generated during site preparation would be reduced compared to the 2020 project. In addition, the modified project no longer proposes pile driving, which would produce the highest construction noise levels. Instead, a mat-slab foundation would be constructed, and resultant noise levels would be substantially less at nearby sensitive land uses. Vibration levels from other heavy vibration generating construction equipment, including 'typical' vibratory pile driving, vibratory rollers, or clam shovel drops, would not be anticipated to exceed 0.3 in/sec PPV at distances of 20 feet or further from construction. The modified project would no longer need to implement the Condition of Approval to ensure implementation of Mitigation Measure 4.I-3 of the DNSP EIR.

The approved 2020 project was expected to generate 834 trips per day, including 40 a.m. peak hour trips and 66 p.m. peak hour trips. The modified project is expected to generate 983 trips per day, including 57 a.m. peak hour trips and 73 p.m. peak hour trips. Traffic data summarized in the project's traffic study was reviewed and compared to the prior analysis to calculate potential changes to the traffic noise level increase estimates. Roadways evaluated included First Street, Soscol Avenue and McKinstry Street. Based on a comparison between traffic volumes under the existing plus project scenario and existing conditions, the traffic noise increase attributable to the project remains less than 1 dBA CNEL, consistent with the 2020 approved project. For these reasons, the modified project would not result in new or greater noise and vibration impacts than disclosed in the 2020 Addendum.

3.5 Transportation

The transportation system in the project area, including regional and local roadways, bicycle and pedestrian facilities, and existing transit services (i.e., bus and light rail services) has not changed substantially since preparation of the 2020 Addendum. The 2020 Addendum concluded that the approved project, with the implementation of General Plan policies (Policies T-9.1, T-11.A, and T-11.b) and DNSP mitigation measures (4.L-6), would not result in new or more significant impacts to the transportation system than those identified in the DNSP EIR.

3.5.1 Vehicle Miles Traveled

While the City of Napa adopted a vehicle miles traveled (VMT) threshold in May 2021, there is not a specific threshold for hotel uses. Therefore, this analysis relies on the California Governor's Office of Planning and Research (OPR) publication Technical Advisory on Evaluating Transportation Impacts in CEQA. Based on OPR's guidance, it is assumed that hotel developments do not attract new visitors, rather they would distribute where visitors stay. This shift in travel patterns and VMT is similar to how OPR considers retail uses, in which many types of retail projects may generally be presumed to have a less-than-significant VMT impact since the total amount of shopping that occurs in a given geographic area tends to remain unchanged, and in fact adding new retail uses to the urban fabric often reduces the distances (i.e., the "miles" in VMT) that people need to drive on shopping trips. The addition of a new hotel (such as the project) in downtown Napa would not directly increase the total amount of guest lodging demand in the region. Hotel occupancy data for Napa County suggests that there is not an untapped demand; therefore, adding new lodging would not generate new vehicular travel to the area.[4] The addition of new lodging may, however, shift where some guests to the Napa Valley region choose to stay. The project site is centrally located among many of the region's primary visitor attractions, and its location in downtown Napa would also be convenient to those traveling to the area on business. As such, the project could reduce total regional VMT if it results in guests finding lodging opportunities closer to their primary destinations rather than having to stay in less-central locations that require longer driving distances. This potential VMT reduction effect would be further pronounced if guests currently choosing to make a day trip to Napa from locations such as San Francisco, Sacramento, and San Jose instead choose to stay overnight given the convenience and appeal of the project's location. Therefore, the addition of a new hotel in downtown Napa would not directly increase the total amount of guest lodging demand in the region.

The project site is located 0.4 mile from the Soscol Gateway Transit Center, which is a major transit stop.[5,6] CEQA Guidelines Section 15064.3, subdivision (b)(1), states that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high quality transit corridor will have less-than-significant impacts on VMT. The proposed project is located in an area with well-developed pedestrian and bicycle networks, and is located within walking distance of numerous downtown Napa shops, services, and restaurants. For these reasons, consistent with the 2020 approved project, the modified project is presumed to result in a less than significant VMT impact associated with hotel guest travel.

[4] Hotel occupancy rates in Napa County were approximately 67 percent during July 2021 (and approximately 78 percent in 2019 before pandemic-related influences).

[5] A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: Public Resources Code Section 21064.3.

[6] City of Napa. *New State-Imposed Limits on Parking for Development Projects (AB 2097)*. May 2, 2023.

The VMT associated with the hotel employees were obtained from the Solano Napa Activity Based travel demand Model (SNABM). Per the General Plan EIR, the Napa countywide average VMT per employee is 26.90 VMT per employee, and the corresponding significance threshold is 22.87 VMT per employee. The project's VMT per employee is 21.54 miles, which is below the City's threshold of 22.87 VMT per employee. Therefore, consistent with the approved 2020 project, the modified project would have a less than significant VMT impact associated with employee travel.

3.5.2 Level of Service Policy Evaluation

While a project's effect on automobile delay is no longer considered an impact under CEQA, local jurisdictions have roadway level of service (LOS) standards. The LOS traffic impacts from the proposed project have already been analyzed and accounted for in the DNSP Final EIR. Implementation of the proposed project would contribute to the overall LOS impact on intersections in the DNSP. As previously discussed, these impacts were found to be significant and unavoidable and, as a result, the City of Napa adopted a statement of overriding consideration for the DNSP in accordance with CEQA Guidelines Section 15093.

The results of the LOS analysis that were completed for the 2020 Addendum concluded that under existing plus project, existing plus approved plus project, and future plus approved project conditions, all study intersections would operate at acceptable levels during both the AM and PM peak hours when measured against the City's level of service standards.

In order to determine whether the modified project would result in new or greater adverse effects, trips generated by the modified project were estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 11th Edition, 2021, for Hotel (LU 310). Additionally, the anticipated trip generation of the modified project was compared to the potential trip generation for retail and office uses to determine the equivalent amount of office and retail that would generate the same number of trips as the modified project.[7]

A comparison of the modified project, approved 2020 project, and retail/office equivalent's trip generation is provided in Table 3.5-1 below.

[7] The DNSP EIR included development assumptions for a variety of commercial, housing, and entertainment uses in Downtown Napa. The City has indicated that there has been a shift from some of the assumptions made in the DNSP EIR, specifically regarding hotel uses. The DNSP EIR assumed a development capacity of 303 hotel rooms in the Downtown, which would generate 2,476 daily net new trips at full build out. Planned hotel development in the Downtown has exceeded this assumption and, therefore, hotel trips are compared to office and shopping center uses that were also considered in the DNSP EIR and have not been fully developed.

Table 3.5-1: Trip Generation Comparison

			AM Peak Hour			PM Peak Hour		
	Units	**Daily Trips**	**Trips**	**In**	**Out**	**Trips**	**In**	**Out**
Downtown Napa Specific Plan								
Shopping Center	21.5 ksf	796	18	11	7	73	35	38
Office	37.5 ksf	407	57	50	7	54	9	45
Approved 2020 Project	74 rooms	834	40	24	16	66	34	32
Modified Project	123 rooms	983	57	32	25	73	37	36

Notes:

Ksf = 1,000 square feet

Sources:

W-Trans. Traffic Impact Study for First and Oxbow Hotel. August 5, 2019.

W-Trans. Transportation Impact Study for First and Oxbow Gateway Project. January 24, 2023.

As shown in Table 3.5-1, the modified project would generate a higher number of trips per day than that approved 2020 project, both in the AM and PM peak hours. The amount of retail and office uses that would generate an equivalent number of p.m. peak hour trips as the modified project would include 21,500 square feet of retail and 37,500 square feet of office uses. The DNSP specifies that sites within the Downtown II zone (where the project site is located) may consist of medium- to high-density development with a floor area ratio (FAR) of up to 4.0. This equates to up to approximately 139,392 square feet of development, which is considerably higher than the equivalent 21,500 square feet of retail and 37,500 square feet of office used to compare to the modified project. Therefore, the proposed project would generate lower volumes of traffic than other permitted uses analyzed in the DNSP EIR.

The results of the intersection LOS analysis for the modified project (under existing conditions, existing and existing plus project, and baseline and baseline plus project conditions) show that all intersections operate acceptably, except the First Street/McKinstry Street intersection, which operates at LOS F on the southbound stop-controlled approach during the p.m. peak hour. Although the southbound approach to First Street/McKinstry Street operates unacceptably during the p.m. peak hour, the total delay for the one-lane approach is about 0.9 hours, which is less than the four hours allowed under the City's standards. Therefore, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.5.3 General Plan Crucial Corridor Policy Evaluation

The City of Napa General Plan identifies several routes that serve a particularly vital role in communitywide circulation and in providing accessibility to key community facilities such as Crucial Corridors. The City's key circulation policies in its traffic management strategy have been

established to reserve traffic capacity within these major corridors for communitywide circulation. In general, Crucial Corridor Policies limit additional driveways to these streets and discourage high traffic-generating uses.

According to the City of Napa Policy Guidelines for Traffic Impact Analysis for Private Development Review, uses along crucial corridors shall generate less than 520 daily trips per gross acre. Soscol Avenue from West Imola Avenue to Trancas Street is designated as a Crucial Corridor.

The proposed project would be expected to generate 983 daily trips. The gross floor area proposed is 120,504 square feet, or about 2.77 acres (43,560 square feet equal an acre). This translates to 355 trips per day per gross acre. Therefore, the project would be consistent with the City's crucial corridor requirement. Therefore, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.5.4 Other Transportation Modes

Consistent with the findings of the DNSP EIR, the 2020 Addendum found that the approved project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, nor would it decrease the performance or safety of existing facilities in the immediate vicinity of the project site.

Existing pedestrian facilities are adequate to serve the modified project. Signal timing at the Soscol Avenue/First Street intersection currently includes a leading pedestrian interval.[8]

The City of Napa Bicycle Plan includes provision of a Class II bike lang along the project frontage on First Street. Therefore, the modified project site would be required to implement this improvement along the frontage.

Existing transit facilities are adequate to serve the modified project.

Based on the above, the modified project would not result in new or greater impacts than disclosed in the 2020 Addendum.

3.6 Utilities and Service System

The approved 2020 Addendum concluded that the project would be adequately served by existing utilities. Consistent with the DNSP EIR, the approved 2020 project would be required to pay its fair share of water system improvements and development impact fees.

The modified project would increase the number of hotel rooms from 74 to 123 and eliminate the 6,294 square feet of ground floor retail. The increase in the number of hotel rooms would increase

[8] A leading pedestrian interval (LPI) gives pedestrians the opportunity to enter the crosswalk at an intersection three to seven seconds before vehicles are given a green light indication.

demand for water and wastewater, and generate additional solid waste. In addition, pipe upsizing required for the modified project would be subject to the ground disturbance mitigation measures identified in the DNSP EIR (Mitigation Measure 4.D-2a, 4.D-2b, 4.D-3, and 4.D-4).

The modified project would have a water demand of approximately 12,300 gallons per day (gpd)[9], an increase of approximately 3,326 gpd compared to the approved 2020 project. The DNSP EIR concluded that implementation of the Specific Plan would have adequate water supply sources based on the projections of the City's Urban Water Management Plan. The City of Napa's existing water supply remains adequate for normal demand through 2035 and the completed construction of a recycled water pipeline under the Napa River will reduce overall potable water demand. Consistent with the findings of the DNSP EIR, the project would be required to pay its fair share of water system improvements, as required by General Plan policies CS-1.2 and CS-1.4.

The modified project would generate approximately 10,455 gpd of wastewater, an increase of approximately 2,822 gpd compared to the approved 2020 project. The DNSP EIR concluded that implementation of the Specific Plan would result in an increase in wastewater generated in the Planning Area, potentially affecting the capacity of the wastewater treatment plant operated by Napa Sanitation District. The DNSP EIR included development-driven fees, as required by General Plan policies CS-1.2 and CS-1.4. The modified project would be required to pay its fair share of wastewater system improvements and development impact fees. In doing so, the project would be consistent with the findings of the DNSP EIR and would have a less than significant impact on wastewater treatment.

The modified project would generate approximately 89,790 pounds of solid waste per year, an increase of approximately 30,0236 pounds per year. The DNSP EIR concluded that implementation of the Specific Plan would result in an increase in the amount of solid waste generated. Although the increased residential population and business activities resulting from implementation of the Specific Plan would incrementally increase the total waste generated by the City, the increasing rate of diversion through recycling, composting, and other methods would result in a decreasing share of total waste that would be disposed in landfills serving the City.

Based on the above, the modified project would not result in new or greater utilities and service system impacts than disclosed in the 2020 Addendum.

[9] Based on a demand factor of 100 gpd per hotel unit.

Section 4.0 Conclusions

Based on the above analysis and discussion, no subsequent EIR or other environmental review is required because no new significant impacts or impacts of substantially greater severity would result from the modified project. There have been no changes in circumstance in the project area that would result in new significant environmental impacts or substantially more severe impacts, and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the 2020 Addendum or DNSP Final EIR. Therefore, pursuant to State CEQA Guidelines Section 15164, an Addendum has appropriately been prepared.

Pursuant to CEQA Guidelines Section 15164(c), this Addendum need not be circulated for public review, but will be included in the public record file for the DNSP Final EIR.

Section 5.0 References

City of Napa. *Downtown Napa Specific Plan Program Environmental Impact Report*. January 2012.

City of Napa. *First and Oxbow Gateway Project Initial Study/Addendum*. June 2022.

Illingworth & Rodkin, Inc. *First and Oxbow Project Revisions to Air Quality Analysis Memo*. April 11, 2023.

Illingworth & Rodkin, Inc. *First & Oxbow Gateway Project Update to the Air Quality Impact Analysis.* December 7, 2023.

Illingworth & Rodkin, Inc. *First & Oxbow Gateway Project Memo*. March 31, 2023.

W-Trans. *Transportation Impact Study for First and Oxbow Gateway Project*. January 24, 2023.