

DRAFT ENVIRONMENTAL ASSESSMENT

NAPA-FRANKLIN STATION NAPA, CALIFORNIA



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Executive Summary

The United States Postal Service (USPS) has prepared this Environmental Assessment (EA) pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969, its implementing procedures at 39 CFR 775, the USPS *Facilities Environmental Guide* (Handbook RE-6, November 2004) and accompanying EA Scope of Work (Appendix B), and the President's Council on Environmental Quality regulations (40 CFR parts 1500-1508) for the proposed sale (disposal) of the USPS Napa-Franklin Station, located at 1351 2nd Street, Napa, California 94559-9991. The Napa-Franklin Station building sustained significant structural damage during the South Napa Earthquake in August 2014 and has been inoperable and unoccupied since that time. Constructed in 1933, the Napa-Franklin Station was listed in the National Register of Historic Places in 1985.

USPS has determined that its preferred alternative for addressing the current and future concerns associated with the Napa-Franklin Station property (i.e., the Proposed Action) is to dispose of via sale the 13,020-square-foot structure and 0.66-acre property and offer it in its current condition to an as-yet undetermined buyer. Section 106 of the National Historic Preservation Act, which USPS voluntarily complies with, identifies “the transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance” as an example of an adverse effect. Therefore, as part of the Proposed Action, USPS will impose a preservation covenant upon the property and building at the closing of the sale and avoid potentially creating an adverse effect on this historic resource.

This Environmental Assessment concludes that the Proposed Action would not result in significant adverse impacts on the physical or cultural environment. The Proposed Action would have a long-term beneficial impact on USPS operations by providing the most cost-effective alternative for USPS and its customers while preserving the historic character and nature of the Napa-Franklin Station through use of the preservation covenant. Other alternatives considered, including USPS’s rehabilitation of the existing building, demolition of the building and reconstruction of a new facility on the existing site, or demolition and establishment of a new facility on another site, most likely through a lease agreement, would be cost prohibitive and would possibly impede, or at the least, not further enhance USPS operations. Demolition and acquisition and construction of a new off-site facility is an uncommon practice for the USPS and not considered a viable alternative. Furthermore, leaving the facility in its current condition without occupancy and restoration (i.e., the ‘No Action’ alternative) would likely lead to further decline of the structure and result in adverse safety, aesthetic, economic and historic impacts. Also, this scenario would cause USPS to expend funds, as even minimal maintenance is required, on unusable space.

In summary, the Proposed Action would result in both the fewest overall environmental impacts and least costs of all the alternatives, including the No Action alternative. It is USPS’s best approach to addressing the future of the Napa-Franklin Station.

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Introduction

The United States Postal Service (USPS) has prepared this Environmental Assessment (EA) pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969, its implementing procedures at 39 CFR 775, the USPS *Facilities Environmental Guide* (Handbook RE-6, November 2004) and accompanying EA Scope of Work (Appendix B), and the President's Council on Environmental Quality Regulations (40 CFR parts 1500-1508) for the proposed sale (disposal) of the USPS Napa-Franklin Station, located at 1351 2nd Street, Napa, California 94559-9991. The Napa-Franklin Station building sustained significant structural damage during the South Napa Earthquake in August 2014 and has been inoperable and unoccupied since that time. Constructed in 1933, the Napa-Franklin Station was listed in the National Register of Historic Places in 1985. As a result, USPS has initiated consultation with the Advisory Council on Historic Preservation and the California Office of Historic Preservation under Section 106 of the National Historic Preservation Act (36 CFR Part 800), which USPS voluntarily complies with.

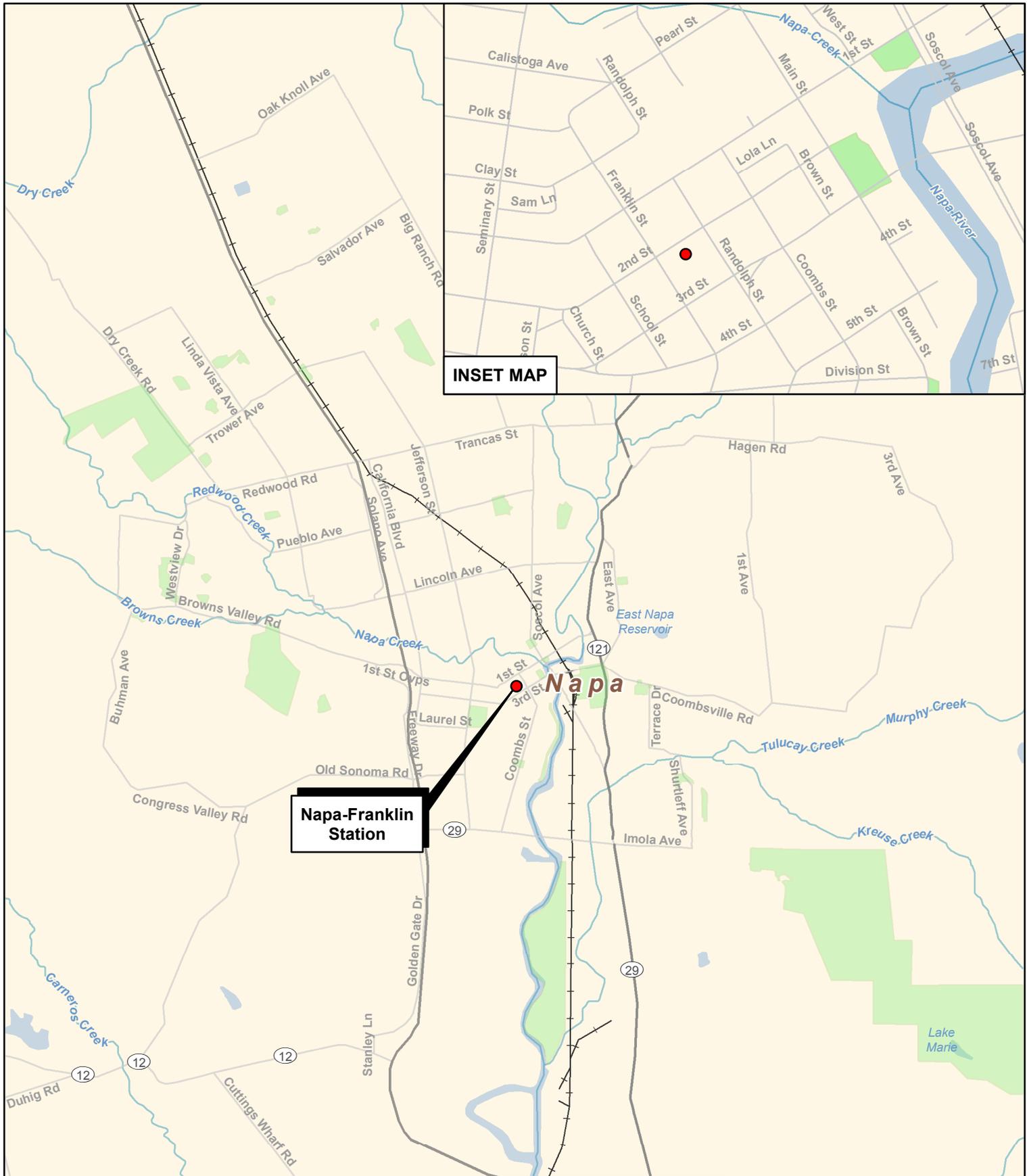
USPS has determined that its preferred alternative for addressing the current and future concerns associated with the Napa-Franklin facility (i.e., the Proposed Action) is to dispose of via sale the 13,020-square-foot structure and 0.66-acre property and offer it in its current condition to an as-yet undetermined buyer. The Section 106 regulations at 36 CFR 800.5(a)(2)(vii) provide “the transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance” as an example of an adverse effect. Therefore, as part of the disposal, USPS will impose a preservation covenant upon the property and building at the closing of the sale and avoid potentially creating an adverse effect on this historic resource.

This EA examines and evaluates the impacts of the Proposed Action (disposal with preservation covenant) on the physical and cultural environment. In addition, this EA evaluates the impacts of three other alternatives:

- Rehabilitating the existing Napa-Franklin Station and reestablishing USPS operations at that facility
- Demolishing the building and establishing a new USPS facility on the existing site
- Demolishing the building and occupying a new USPS facility on another site, likely through a lease agreement.

This EA also evaluates the impacts of a “No Action” alternative, which would involve retaining the Napa-Franklin Station in its current condition and retaining USPS ownership and management of the building and grounds, with no operations on site. A map showing the location of the Napa-Franklin Station and the surrounding vicinity is presented in **Figure 1**. An aerial photograph of the Station and project vicinity is presented in **Figure 2**.

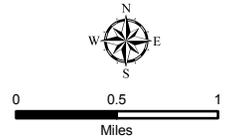
Based on the analysis contained within this EA, USPS has concluded that the Proposed Action would not result in significant impacts to the physical and cultural environment and is the best approach to addressing the future of the Napa-Franklin Station. The Proposed Action would have a long-term beneficial impact on USPS operations by providing the most cost-effective alternative for USPS and its customers while preserving the historic character and nature of the Napa-Franklin Station and minimizing overall impacts on the physical and cultural environment.



INSET MAP

Napa-Franklin Station

- Legend**
- Napa-Franklin Station
 - Highway
 - Local Road
 - Railroad
 - ~ River or Stream
 - = Open Water
 - Park



Data Sources: ESRI, 2012; USGS 2012
 Geographic Coordinate System: NAD_1983_StatePlane_California_1_FIPS_0401_Feet
 Datum: North American Datum of 1983 (NAD83)
 Projection: Transverse Mercator
 Linear Unit: Foot_US
 Ellipsoid: Geodetic Reference System 80.



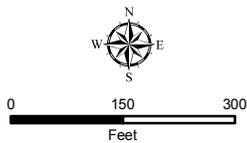
**US Postal Service
 Environmental Assessment
 Napa-Franklin Station
 Napa, California**

Figure 1. Project Location Map





Napa-Franklin Station



Data Sources: ESRI, 2012; USGS 2012
 Geographic Coordinate System: NAD_1983_StatePlane_California_L_FIPS_0401_Feet
 Datum: North American Datum of 1983 (NAD83).
 Projection: Transverse Mercator.
 Linear Unit: Foot_US
 Ellipsoid: Geodetic Reference System 80.



**US Postal Service
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Figure 2. Aerial Map



Purpose and Need for Action

As indicated previously in the *Earthquake Damage Report* prepared for the USPS in July 2015 (ATI, 2015), the Napa-Franklin Station building sustained significant structural damage during the South Napa Earthquake in August 2014. As a result, the building was closed and fenced off and has been inoperable and unoccupied since that time. Constructed in 1933, the Napa-Franklin Station was listed in the National Register of Historic Places (NRHP) in 1985.

The Napa-Franklin Station Building

The Napa-Franklin Station is one of three Postal facilities serving the City of Napa. From the time it was constructed in 1933, until the mid-1960s, it served as Napa's only Post Office. It was converted to a subordinate Station when the new Napa Post Office on Trancas Street was constructed in 1966.

According to the Earthquake Damage Report (ATI, 2015), the Napa-Franklin Station, designed by Architect William H. Corlett, is a fine example of the Federal Art Deco (sometimes called "Stripped Classical") style, which was a popular style for public buildings constructed during the Great Depression. The Building is relatively simple in both plan and elevation. The overall dimensions of the building are approximately 121 feet by 68 feet. The front façade, viewed from Second Street, is divided into three portions. The central portion, which comprises about 3/5 of the building's length, is approximately 32 feet to the top of parapet. The two flanking portions, each about 1/5 of the building's length, are approximately 4 feet lower than the central portion. Areaways are located on the east and west ends of the building and along the center portion of the front of the post office to allow daylight into the perimeter basement spaces.

The main exterior materials are tan-colored brick, glazed terra-cotta trims, tall painted steel windows and a granite-clad base. Large cast-iron lamps flank the entries at each end of the front façade, and a deep roof covers the loading dock at the rear. The public areas of the building interior consist of the Main Lobby and the Mailbox Lobby, which together extend the full length of the building on the north side. The lobbies are tall, visually connected spaces separated by a full-height glazed partition. Both lobbies contain a number of historic finishes, including ornate plaster ceilings (ATI, 2015).

The remainder of the first story consists of non-public areas, which are dedicated to typical post office functions, including transaction counters, sorting areas, a large workroom and a loading dock. Smaller rooms at the first story level include a Manager's Office, restrooms, a locker room and two safes (ATI, 2015).

The Mezzanine level houses a restroom, a locker room, a break room, a mechanical room and an office. Accessed separately, a Lookout Gallery, which spans the main workroom from the east end to the west end of the building, is suspended from the roof structure at the same level as the Mezzanine. Although the attic is accessible from the Mezzanine level, it is not a usable space (ATI, 2015).

The Basement contains offices, training rooms, storage rooms, a boiler room and a maintenance room. Two offices in the basement were leased to an outside agency before the earthquake rendered them uninhabitable (ATI, 2015).

Overview of Damage

As documented in the Earthquake Damage Report (ATI, 2015), the Napa-Franklin Station sustained extensive damage to the historic exterior, especially at the building corners. Damage to interior partitions ranged from minor cracking to catastrophic collapse in portions of the interior. Although the ceilings survived the earthquake far better than the plaster walls, their ceiling suspension systems in the attic may also have been damaged. The Earthquake Damage Report indicated exterior, interior, and structural damage sustained by the structure included the following:

Exterior

- Crushing of terra cotta and brick, primarily at bases of walls
- Lateral displacement, primarily at tall, narrow pilasters
- Diagonal cracking, primarily at building corners
- Broken window glazing and damaged sash

Interior

- Cracking of plaster
- Major cracking of hollow clay tile
- Plaster disengagement
- Hollow clay tile wall collapse in limited areas
- Ceiling collapse in limited areas

Structural

The underlying steel structural system appears to be undamaged. It is unclear as to whether the steel frame returned to its plumb position after the ground shaking, or whether a permanent set due to drift has taken place. Further investigations may determine the extent of any concealed structural damage including:

- Concrete cracking
- Concrete reinforcement disengagement
- Steel deformation
- Fastener failure

Although the building's steel frame appears to have survived the earthquake relatively intact, investigation has shown that the concrete slabs at the first story, second story and roof levels have poor structural capacity making it difficult to improve the lateral load resisting system necessary to meet current seismic and safety standards that a restoration would require. Further, with the majority of damage to the historic masonry veneer brick occurring at the base of relatively tall walls, the expectation is it will require the complete removal and reconstruction of the veneer which would involve shoring in place. The steel structure was not designed to support the dead load of the brick veneer, therefore shoring in place is unlikely to be achievable.

Therefore, repairs would require complete removal and reconstruction of the veneer, significantly impacting the historic integrity of the building. (ATI, 2015).

Because of this extensive damage, the Earthquake Damage Report concluded that USPS consider demolition and replacement of the building.

Following the earthquake, the NRHP nomination of the building was amended. The nomination amendment noted that while there was damage to several character-defining features including brickwork, terracotta, windows, and marble wainscoting, "...the 2014 earthquake damage did not significantly affect the property's exterior architectural integrity of design, workmanship, materials, and location. The property continues to meet Criterion C for listing in the NRHP because the qualities which caused it to be originally listed are still conveyed" (Brunzell & Mates, 2015). Therefore, the Napa-Franklin Station remains listed in the NRHP.

Subsequent Proceedings

Subsequent to the damage report, in June 2015, USPS initiated consultation with the Advisory Council on Historic Preservation and the California Office of Historic Preservation under Section 106 of the National Historic Preservation Act (36 CFR Part 800), sending a letter and supporting documentation informing them of the plans to demolish the building¹ (USPS, 2015a). However, following that submission, USPS received significant input from the agencies, public officials, and members of the public requesting that USPS find a way to preserve the historic building. In response to these comments, USPS decided that it would consider selling the Napa-Franklin Station and property to a buyer who will agree to record a covenant on the property, thereby preserving the significant historic exterior and interior features of the building.

The preservation covenant requires the review and approval of rehabilitation, alteration, or modification plans to the Property by a covenant enforcer to ensure consistency with 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* in order to preserve the physical integrity of those characteristics of the Property that qualify it for inclusion in the National Register of Historic Places. The preservation covenant would be recorded with the deed at the time of property transfer. Thus, assuming that the sale occurs subject to such a covenant, USPS would propose that such a sale would not have an adverse effect on any historic properties and is acceptable as mitigation of the adverse effect of the previously identified undertaking. USPS is presently seeking a preservation covenant enforcer² for the property.

¹ Initial Section 106 consultation letter and accompanying documentation and attachments dated June 26, 2015 from Daniel Delahaye, Federal Preservation Officer, USPS, to Carol Roland-Nawi, California State Preservation Officer, Office of Historic Preservation, and John Fowler, Executive Director, Advisory Council on Historic Preservation. Letter is included in Appendix B.

² The covenant enforcer ensures consistency with 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 in order to preserve the physical integrity of those characteristics of the Property that qualify it for inclusion in the National Register of Historic Places.

Alternatives

Alternatives Evaluated But Eliminated

No alternatives evaluated have yet been eliminated from further evaluation. USPS's original preferred concept was to demolish the Napa-Franklin Station Post Office building due to its extensive damage. In June 2015, USPS initiated the Section 106 process by sending a letter and supporting documentation to the California State Department of Parks and Recreation, the Office of Historic Preservation (the California State Historic Preservation Officer, or SHPO) and the Advisory Council on Historic Preservation (ACHP) informing them of the plans to demolish the building. However, following that submission, USPS received significant input from the agencies, public officials, and members of the public requesting that USPS find a way to preserve the historic building. As discussed previously in the Subsequent Proceedings section in response to these comments, USPS changed its preferred alternative to sell the Napa-Franklin Station and property to a buyer who will agree to record a covenant on the property, preserving the significant historic exterior and interior features of the building. The selling, or disposal, of Napa-Franklin Station with a preservation covenant is USPS's Proposed Action and is evaluated as such in this Environmental Assessment.

Proposed Action

The Proposed Action would involve disposing of the 13,020-square-foot Napa-Franklin Station structure and 0.66-acre property and offering it for sale in its current condition to an as-yet undetermined buyer. As part of the sale, USPS will impose a preservation covenant upon the property and building at the closing of the sale in order to comply with historic preservation components of the Section 106 regulations at 36 CFR 800.5(a)(2)(vii) and avoid potentially creating an adverse effect on this historic property. Specifically, including such a covenant as part of the sale will ensure that the "transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance" is avoided and the historic Napa-Franklin Station is protected for future use.

The preservation covenant requires the review and approval of rehabilitation, alteration, or modification plans to the Property by a covenant enforcer to ensure consistency with 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* in order to preserve the physical integrity of those characteristics of the Property that qualify it for inclusion in the National Register of Historic Places.

At this time, while the building and property are being analyzed from a marketing standpoint, a potential buyer or future use of the building and property has not yet been identified. Additionally, at this time, a covenant enforcer has not yet been identified. Therefore, the primary focus of the 'Proposed Action' alternative is on the disposal action itself, with the protective covenant. Impacts and any associated mitigation are discussed to the degree possible in Section 5. Of paramount importance is the expectation that between historic resources preservation requirements and established land use and zoning requirements for the Site and its

surroundings, future use is anticipated to be similar to the MPO use when the facility was operational.

Alternatives to the Proposed Action

In addition to the Proposed Action, USPS is considering several other alternatives to disposing of the Napa-Franklin Station facility and property. These alternatives are as follows:

Rehabilitation of Existing Station

This alternative would involve rehabilitating the existing Napa-Franklin Station and reestablishing USPS operations at that facility. Once operations have restarted, it is assumed that the nearby USPS facility that was established to take the load from the loss of the Napa-Franklin Station following the earthquake (i.e., the Post Office at 1436 Second Street) would cease operations.

In its July 2015 *Earthquake Damage Report* (ATI, 2015), USPS identified two potential rehabilitation options:

- Option 1: Restore the building to its pre-earthquake condition. This includes historic restoration efforts, but does not include seismic retrofitting or accessibility work.
- Option 2: Reinforce the existing structural system to improve seismic performance. This work would be done in conjunction with Option 1. Option 2 includes some accessibility improvements, including a new exterior ramp, counter, single unisex restroom, door hardware improvements, an elevator for mezzanine and basement access, lifts for basement ingress/egress, and a new fire alarm system.

The designated Rehabilitation Alternative would be Option 2 since, before resuming USPS operations at the site, the seismic requirements cannot be overlooked for future safe use and access. USPS has determined the estimated, combined cost for completing Option 2 would be more than four times the cost of a similarly sized, newly constructed station, including demolition of the MPO. These costs do not include restarting and continuing mail operations, nor the costs of closing any other temporary facilities.

Demolition with New On-site Station

This alternative involves demolishing the Napa-Franklin Station building and establishing a new USPS facility on the existing site. As mentioned previously, USPS originally considered demolishing the building and initiated Section 106 consultation with the California SHPO and the ACHP. The initial consultation package was sent because USPS had made a finding that demolishing the building would result in an adverse effect on the property because of its listing in the National Register of Historic Places. Therefore, implementing this alternative would require consultation with those agencies and other stakeholders to resolve the adverse effect pursuant to 36 CFR 800.6. Rebuilding a new USPS on the existing property at 1351 Second Street would require demolition of the existing facility, disposal/recycling of all building materials, special handling of asbestos-containing and lead-based painted materials, restoration

of the existing land, and construction of a new USPS facility. Once operations would restart, it is assumed that the nearby USPS facility that was established to take the load from the loss of the Napa-Franklin Station following the earthquake (i.e., the Station at 1436 Second Street) would cease operations. The size and layout of the new facility, costs, specific operations, and other functions have not yet been determined, mainly since the response to not opt for demolition has been strong from the public and historic preservation community. Nevertheless, such a demolition and new construction project would be a multi-million dollar endeavor based on USPS's experience with similar projects in the past.

Demolition with New Off-site Station

This alternative would involve demolishing the existing Napa-Franklin Station building and establishing a new facility on another site, most likely through a lease agreement at an existing space. Once operations would restart, it is assumed that the nearby USPS facility that was established to take the load from the loss of the Napa-Franklin Station following the earthquake (i.e., the Post Office at 1436 Second Street) would cease operations. The size and layout of the new off-site facility, costs, specific operations, and other functions have not yet been determined, nor has an actual location for such a facility yet been identified, mainly since the response to not opt for demolition has been strong from the public and historic preservation community. Nevertheless, similar to the option of 'Demolition with New On-site Station,' the demolition and new, long-term lease of an existing Napa space, with renovations to adapt to USPS use, would be a multi-million dollar endeavor based on many similar Postal efforts. Note that this option does not include disposition plans for the post-demolition vacant lot as that action is too speculative at this time.

No Action Alternative

NEPA regulations require USPS to consider a "No Action" alternative in its NEPA analyses. In this case, the no action alternative would involve retaining the Napa-Franklin Station in its current condition and retaining USPS ownership and management of the building and grounds. Due to the structural damage caused by the Napa earthquake, however, operations would not resume at the Napa-Franklin Station under a No Action alternative. Therefore, operations at the other USPS facilities designed to provide the services lost from the closure of the Napa-Franklin Station (e.g., 1436 Second Street) would need to continue. Even with USPS basic maintenance of the Station under the No Action alternative, the Station's condition would likely further decline with lack of occupancy and restoration.

USPS believes that the No Action alternative is not a feasible option for the future of the Napa-Franklin Station. USPS considers leaving the property and building generally in its current condition would neither provide long-term operational benefits to the USPS, nor address the historic, land use and visual impacts created by inaction.

Environmental Consequences and Mitigation

Physical Environment

Topography, Geology, and Soils

The Napa-Franklin Station site is located in the City of Napa, Napa County, California and is shown on the U.S. Geological Survey (USGS) Napa Quadrangle 7.5-minute topographic map (U.S. Geological Survey, 2010). Elevation of the USPS project site is 22 feet above mean sea level (msl)³. Topographically, the site is generally flat, as is much of the surrounding area⁴. The only ephemeral surface water features identified in close proximity to the site are the Napa River and Napa Creek and their associated wetlands, which are located approximately 0.2 mile north and east of the Site. No surface water features are located on the Site.

According to the U.S. Department of Agriculture (USDA), the soil underlying the site is mapped as Cole silt loam (0 to 2% slope). The soil type present beneath the site is the Wadena complex. According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) geospatial data, the dominant soil type present beneath the site is Cole, which consists of somewhat poorly drained soils. The geology beneath the site consists of soils with slow infiltration rates and a silty loam texture. The site is located in an area that the USGS and California Geological Survey (CGS) have identified as being susceptible to earthquakes and strong ground shaking during a seismic event. In August 2014, the South Napa Earthquake caused considerable damage in the area, prompting the President of the United States to declare the area a major disaster site. USPS reported that the Napa-Franklin Station was significantly damaged as a result of the South Napa Earthquake. A damage assessment commissioned by USPS (ATI, 2015) concludes that extensive work will be required to repair the building and bring it up to current health and safety code requirements, particularly for future seismic concerns. The compromised structural condition of the building and its susceptibility to future earthquake events/strong ground shaking presents an immediate and on-going threat (ATI, 2015).

Impacts to Topography, Geology, and Soils

Proposed Action

The Proposed Action would have minimal or no impact to site or area topography, geology, or soils because no extensive construction would take place that would involve extensive earthwork. The future buyer of the property would be expected to rehabilitate the building and improve the grounds in accordance with the preservation covenant and all appropriate federal, state, and local building requirements.

Sources: ³ESRI World Elevation Shapefile (2012).

⁴ ³USGS Topographic shapefile (2014).

Rehabilitation of Existing Station

Improvements to the property under this alternative would likely include excavation, shoring, and foundation support of the existing Napa-Franklin Station building to bring it up to seismic standards. According to recommendations in the Earthquake Damage Report, conceptual seismic improvements could include construction of new concrete shear walls, which would be founded on new grade beams and would likely require micropiles at each end to resist up-lift forces (ATI, 2015). The building rehabilitation and any ground improvements would be designed and executed in accordance with recommendation of a geotechnical engineer and all appropriate federal, state, and local building requirements to minimize impacts on local soils and geology. Potential to bring in fill from an outside source in order to stabilize the existing site is likely; however such activity would result in minimal impacts.

Demolition with New On-site Station

Construction activities at the subject site under this alternative would likely include clearing and grading of land and construction of a new building and associated parking, loading docks, and driveways. These improvements could require excavation of trees and vegetation on the site (see Vegetation section) as well as grading of the soil. Proper soil management during construction earthwork and grading activities would control soil erosion and increased surface water runoff to protect water quality in any nearby waters.

The improvements to the property would be designed and executed in accordance with recommendations of a geotechnical engineer. The developer and contractor, with assistance from USPS if necessary, would apply for and comply with all applicable Napa County soil and erosion control requirements and associated best management practices (BMPs) as specified in Chapter 4 and Chapter 5 of the Napa County Code (Napa County, 2014). These requirements include a soil and erosion control plan detailing the methods and techniques to be used to control erosion, sedimentation, and stormwater impacts from construction, including: proposed site plans, tree protection plan, applicable buffers, best management practices (e.g., the use of silt fencing), drainage plan, and other components. Compliance with a Napa County-approved soil and erosion control plan would minimize erosion on and off the proposed USPS site and resulting adverse impacts to soils and water quality. Potential to bring in fill from an outside source to stabilize the site is likely; however, this would result in minimal impacts.

USPS would also comply with the Napa Countywide Stormwater Pollution Prevention Program (NCSPPP). The NCSPPP is a joint effort of Napa's cities, towns and unincorporated areas to: prevent storm water pollution; protect and enhance water quality in creeks and wetlands; preserve beneficial uses of local waterways; and comply with State and Federal regulations. To reduce pollution and meet permit requirements, the City of Napa adopted Chapter 8.36, Stormwater Runoff Pollution Control Ordinance. The purposes of this chapter are to protect the public health, safety and general welfare; to protect water resources and to improve storm water quality within the MS4 and receiving waters; to cause the use of management practices by the City (and its residents, businesses, and property owners) that will reduce the adverse effects of

polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the city is compliant with applicable state and federal law (City of Napa, 2014). These measures contribute to protection of soil resources.

Demolition with New Off-site Station

Impacts to soils and grounds under the demolition component of this alternative would be the same as the demolition for the above on-site construction alternative. The new off-site Post Office location would most likely be a lease of existing space, so soil impacts are anticipated to be minimal. Any site renovations would mainly be only on the existing building versus grounds. However, if applicable, compliance with a Napa County-approved soil and erosion control plan would minimize erosion on and off the proposed USPS site and resulting adverse impacts to soils and water quality.

No Action

The No Action alternative would have minimal impact to site or area topography, geology, or soils because no construction or soil/ground-disturbing activities would take place. However, the limited maintenance of grounds could result in some natural degradation of soil resources over time.

Mitigation Measures for Topography, Geology, and Soils

Proposed Action

No mitigation measures would be necessary under the Proposed Action since impacts would be minimal.

Rehabilitation of Existing Station

USPS would implement measures that would address seismic impacts to the existing site by restoring the building to its pre-earthquake condition and reinforcing the existing structural system to improve seismic performance. Complying with Section 106 process pursuant to 36 CFR Section 800 would also ensure that the USPS would:

- (1) Implement short-term measures needed to stabilize and protect the historic building from further damage should there be another earthquake event in the area
- (2) Implement long-term permanent improvements to rehabilitate and restore the historic building to current health and safety requirements.

Without such measures, the historic building remains susceptible to further damage or collapse, which could damage or destroy the character defining elements that have been identified as being integral to the site. Potential impacts from any ground-disturbing activities undertaken for seismic improvements (e.g., the installation of micropiles) would be mitigated through design and construction methods approved by a geotechnical

engineer and in compliance with all appropriate federal, state, and local building requirements.

USPS would follow the land disturbance and erosion control plan requirements as specified within the City of Napa Code, including specified BMPs, to prevent any significant adverse impacts on soils and resulting erosion impacts. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. USPS would also comply with applicable goals and policies of the City's NCSPPP. USPS would revise its existing Stormwater Pollution Prevention Plan (SWPPP) for the Napa-Franklin Station site accordingly to account for changes to the site resulting from the proposed rehabilitation or new construction to be in compliance with any relevant California Pollution Control Agency requirements. Adhering to the approved plans would minimize adverse impacts from soil erosion (and as a by-product, potential water quality impacts) to on-site or off-site water bodies that could occur from disturbances created by the rehabilitation of the Napa-Franklin Station site. With these controls in place, no significant adverse impacts on soils would occur and no additional mitigation measures would be required. USPS would consult with the City of Napa throughout project construction as appropriate.

Demolition with New On-site Station

USPS would implement measures that would address seismic impacts to the existing site by constructing a new building. Seismic performance would be enhanced under the design and recommendations of a geotechnical engineer and in accordance with applicable regulations.

USPS would follow the land disturbance and erosion control plan requirements as specified within the City of Napa Code, including specified BMPs, to prevent any significant adverse impacts on soils and resulting erosion impacts. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. USPS would also comply with applicable goals and policies of the City's NCSPPP. USPS would revise its existing Stormwater Pollution Prevention Plan (SWPPP) for the Napa-Franklin Station site accordingly to account for changes to the site resulting from the proposed demolition and new construction to be in compliance with any relevant California Pollution Control Agency requirements. Adhering to the approved plans would minimize adverse impacts from soil erosion (and as a by-product, potential water quality impacts) to on-site or off-site water bodies that could occur from disturbances created by the demolition and new construction of the Napa-Franklin Station site. With these controls in place, no significant adverse impacts on soils would occur and no additional mitigation measures would be required. USPS would consult with the City of Napa throughout project construction as appropriate.

Demolition with New Off-site Station

No mitigation measures would be necessary since the new off-site Station location would most likely be a lease of existing space, likely only involving renovation to an existing building or grounds. However, if applicable, compliance with a Napa County-approved soil and erosion control plan would minimize erosion on and off the proposed USPS site and resulting adverse impacts to soils and water quality.

Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. Where applicable, USPS, or the site owner, would follow the land disturbance and erosion control plan requirements as specified within the City of Napa Code, including specified BMPs, to prevent any significant adverse impacts on soils and resulting erosion impacts. USPS would also comply with applicable goals and policies of the City's NCSPPP. Adhering to the approved plans would minimize adverse impacts from soil erosion or potential water quality impacts to on-site or off-site water bodies that could occur from disturbances created by the earthwork that might be required with the off-site location. With these controls in place, no significant adverse impacts on soils would occur and no additional mitigation measures would be required. USPS or the site owner would consult with the City of Napa throughout project construction as appropriate.

No Action

No mitigation measures would be necessary because the No Action alternative would have minimal impact on soils or geology. Basic grounds maintenance such as adding protective mulch cover would likely be reduced compared to conditions pre-earthquake, but soil impacts would be minimal.

Hydrology and Water Quality

The only surface water features identified in close proximity to the site are the Napa River and Napa Creek (see Figure 1). The Napa River is located approximately 0.2 mile east of the Site and the Napa Creek is located approximately 0.2 mile northeast of the Site at their closest points. No surface water features are located on the Site. Surface water from precipitation on the Site is expected to flow via sheet flow into the street, and then discharge into the City storm sewer.

The inferred direction of shallow groundwater flow in the area is generally expected to be in an easterly direction toward Napa River. Manmade influences such as buildings and other surface structures and underground sewer lines and/or other buried utility lines may alter the local shallow groundwater flow pattern. Based upon the inferences regarding hydraulic conductivity (i.e., the rate at which water moves through material) and the local hydraulic gradient, shallow groundwater would be expected to move at a slow rate in the vicinity of the site.

Impacts to Hydrology and Water Quality

Proposed Action

The proposed disposition of the Napa-Franklin Station would not result in any significant impacts to hydrology and water quality because no major earthwork-related construction would take place at the Site under the Proposed Action.

Rehabilitation of Existing Station

Rehabilitating the existing Napa-Franklin Station would result in minimal to no significant impacts to hydrology and water quality because no surface water features are located on Site. Compliance with County and City water quality and soil erosion and control plans and permits (see Topography, Geology and Soils section) during construction would minimize any adverse impacts to off-site water sources.

Demolition with New On-site Station

Demolition, construction, and operation would likely require clearing site vegetation (some trees) and disturbing soils through grading and earth-moving activities. Without proper management, an increase in surface water runoff could occur, potentially affecting water quality on or near the site. The developer and contractor, with assistance from the USPS if necessary, would apply for and comply with all applicable Napa County soil and erosion control requirements and associated BMPs in the codes and associated plans and permits (see Topography, Geology and Soils section). These requirements include a soil and erosion control plan and ongoing stormwater management plans detailing the methods and techniques to be used to control erosion, sedimentation, and stormwater impacts from both construction and future operation. Required deliverables would include proposed site plans, applicable buffers, best management practices (e.g., the use of silt fencing), a drainage plan, and other components.

Demolition with New Off-site Post Station

Impacts under demolition with a new off-site Station, presumably a lease of existing space, would be minimal. In the unlikely event that more extensive work for a new off-site effort is required, compliance with a Napa County-approved soil and erosion control plan would minimize erosion on and off the proposed USPS site and resulting adverse impacts to water quality. Operations-related water quality protective measures as described in the previous section would also be followed.

No Action

The No Action alternative would have no impact to site or area hydrology and water quality because no construction would take place, nor would static conditions cause such impacts.

Mitigation Measures for Hydrology and Water Quality

Proposed Action

No mitigation measures would be necessary during execution of the Proposed Action since no major earthwork-related construction will take place at the Site under the Proposed Action.

Rehabilitation of Existing Station

No mitigation measures would be necessary because no hydrological features are located on the existing site. The USPS would follow the soil and erosion control plan requirements as specified within the Napa County Code, including specified BMPs, and ensure coverage under the appropriate Napa County Stormwater Management Program Permit for Stormwater Discharges from Construction Activity, to prevent any significant adverse impacts on water quality from runoff. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. In addition, USPS would follow the Cal EPA General Permit terms and conditions for soil and erosion control, stormwater management, and other resource protection requirements as applicable.

Demolition with New On-site Station

No mitigation measures would be necessary because no hydrological features are located on the existing site. The USPS would follow the soil and erosion control plan requirements as specified within the Napa County Code, including specified BMPs, and ensure coverage under the appropriate Napa County Stormwater Management Program Permit for Stormwater Discharges from Construction Activity, to prevent any significant adverse impacts on water quality from runoff. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. In addition, USPS would follow the Cal EPA General Permit terms and conditions for soil and erosion control, stormwater management, and other resource protection requirements as applicable.

Demolition with New Off-site Station

No mitigation measures would be necessary because demolition with a new off-site Post Office, presumably a lease of existing space, would be minimal. The USPS would follow the soil and erosion control plan requirements as specified within the Napa County Code, including specified BMPs, and ensure coverage under the appropriate Napa County Stormwater Management Program Permit for Stormwater Discharges from Construction Activity, to prevent any significant adverse impacts on water quality from runoff. Mainly for demolition, potential erosion from such activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using

erosion control blankets. In addition, USPS would follow the Cal EPA General Permit terms and conditions for soil and erosion control, stormwater management, and other resource protection requirements as applicable.

No Action

No mitigation measures would be necessary because the No Action alternative would have no impact to site or area hydrology and water quality since no construction would take place, nor would static conditions cause such impacts.

Floodplains

According to the current Federal Emergency Management Agency (FEMA) maps, the Napa-Franklin Station site is not located within the 100-year or 500-year floodplains. The nearest 100-year floodplain is located southeast of the site, approximately 0.75 miles away.

Impacts to Floodplains

Proposed Action

The Proposed Action is not located in a 100-year or 500-year floodplain and would not impact the 100-year floodplain area located southeast of the site, approximately 0.75 miles away.

Rehabilitation of Existing Station

Impacts under this alternative would be similar to those described for the Proposed Action.

Demolition with New On-site Station

Impacts under this alternative would be similar to those described for the Proposed Action.

Demolition with New Off-site Station

The new off-site Post Office location has not been determined at this time. It is possible, but not likely, that the new site could be located within a 100-year or 500-year floodplain in order to accommodate the new facility. In this case, USPS would carefully consider location of floodplains prior to any occupancy and would follow required regulatory and policy requirements. As mentioned, the new site would likely be a lease of existing space.

No Action

The No Action alternative would have no impact to area floodplains because no floodplains are located on, or in close proximity to the Property.

Mitigation Measures for Floodplains

The only potential mitigation measure under all options, including the No Action alternative, would be under the off-site station scenario, if USPS determines it must occupy space in a 100-year floodplain. As mentioned previously, USPS would carefully consider location of floodplains prior to any occupancy and would follow required regulatory and policy requirements. Such measures, applicable policy-wise to the 100-year floodplain, commonly include ensuring adequate structure elevation to prevent flood impacts, avoidance of any hazardous materials storage in a flood-prone area, and examination of the entire site to determine if other options outside the 100-year floodplain are available.

Air Quality

The California Air Resources Board (CARB) monitors air pollutants, makes and enforces laws to maintain air quality, and issues permits to facilities to control air pollution in California. The board, one of five units within the California Environmental Protection Agency (Cal EPA), researches the causes of air pollution and their effects on health and the environment. Based on research findings, the agency develops air quality standards and solutions to California's air pollution problem. The agency's research has resulted in the development of anti-smog technology for industrial facilities and motor vehicles. The board also has the responsibility, in coordination with the Secretary for Environmental Protection, to develop measures to reduce greenhouse gas emissions to 1990 levels by 2020, in accordance with AB 32, the Global Warming Solutions Act of 2006.

Impacts to Air Quality

Proposed Action

The Proposed Action would have minimal impact to air quality at this site because the main construction activity would be focused on the building restoration as a historic resource, resulting in no major changes in air emissions.

Rehabilitation of Existing Station

This alternative would generate minimal fugitive dust emissions during construction activities, mainly in the area of seismic-related measures as they involves some earthwork. Further, no major changes in air emissions are anticipated post-rehabilitation.

Impacts from construction activities would be short term and would not interfere with the maintenance of ambient air quality standards. Standard construction site control measures, such as the application of water or approved dust suppressants to disturbed

soils during dry weather, vehicle washing, and cleaning of paved roadways to remove accumulated dirt, and proper maintenance of construction equipment would further prevent impacts to air quality during construction.

No significant impacts would occur following the resumption of USPS operations on the site. However, the rehabilitated facility would likely include air emission sources, such as new natural gas and/or fuel oil-fired boilers, chillers with an approved refrigerant, or other emissions-producing equipment, which would be covered by the New Source Performance Standard (40 CFR Part 60 Subpart Dc). Emissions would be regulated by the CARB, but emissions from the new facility would not be significant. If required, USPS would obtain necessary air permits in accordance with CARB requirements.

Demolition with New On-site Station

Impacts on air quality from this alternative would be generally similar to the rehabilitation alternative. However, the potential for creating larger amounts of fugitive dust during demolition activities would be greater than the non-demolition alternatives. As stated previously, impacts would be short term and would not interfere with applicable standards. Site control measures as previously described would minimize fugitive dust emissions and air quality impacts during construction. Any emissions-producing equipment required for USPS operations at a new on-site facility would be permitted accordingly to prevent impacts.

Demolition with New Off-site Station

Impacts on air quality from the demolition portion are described in the above section. For the lease of existing space, such impacts would be none to minimal. Should the rare case of more intensive work for the new site be required, impacts would be short term and would not interfere with applicable standards. Site control measures as previously described would minimize fugitive dust emissions and air quality impacts during construction. Any emissions-producing equipment required for USPS operations at a new on-site facility would be permitted accordingly to prevent impacts.

No Action

The No Action alternative would generally have no impact to site or area air quality because no construction would take place. However, static conditions with the No Action alternative could result in minimal air quality degradation as existing boilers, chillers, and other emissions-producing equipment would receive only basic maintenance with no major replacement or improvements. While equipment compliance requirements would be met, best management practices-related system improvements would not be realized.

Mitigation Measures for Air Quality

Proposed Action

The Proposed Action would have minimal impact to air quality at this site because the main construction activity would be focused on the building restoration as a historic resource, resulting in no major changes in air emissions. Therefore, no mitigation measures are anticipated.

Other Alternatives

No additional mitigation measures for the other alternatives would be necessary provided best management practices and site controls during any demolition and construction are implemented and permits for any emissions-producing equipment needed for USPS operations are obtained. USPS or leased site owner would consult with CARB and submit applicable permits for new emission sources as required.

No Action

No mitigation measures would be necessary for the No Action alternative. Basic air emissions-producing equipment maintenance would be followed, with no major system improvements.

Prime Farmland

The Farmland Protection Policy Act of 1981 requires evaluation of farmland conversions to nonagricultural uses. Soils can be categorized as prime farmland, unique farmland, or farmland of statewide or local importance. Farmland may or may not be presently used as cropland. Conversely, land that is presently used as cropland may or may not be prime farmland.

The Napa-Franklin Station property is not located on or in the near vicinity of any prime, unique, or important farmland designated by the U.S. Department of Agriculture/Natural Resources Conservation Service, Napa County, or the City of Napa.

Impacts to and Mitigation Measure for Prime Farmland

There are no anticipated impacts to or mitigations measure for protection of Prime Farmland under all options, including the No Action alternative, as no such resources are on site or nearby.

Wetlands

Available resource maps for the site were reviewed, including USGS topographical maps, U.S. Department of Agriculture soil survey maps, U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) maps, and FEMA FIRM maps. Information from the review of these maps was compiled to determine potential areas of wetlands. Based on this review, there are no wetlands or bodies of water located on the Site. The Napa River is located less than 0.25 mile northeast of the Site, as is the wetland area associated with the river. This wetland is classified as Riverine, Tidal, Unconsolidated Bottom, Permanent-Tidal (R1UBV). There are a total of nine wetlands located within one 1 mile of the Site. No streams and/or topographically defined wetland drainages were identified on the site.

Impacts to Wetlands

Proposed Action

The proposed disposition of the Napa-Franklin Station would not result in any significant impacts to wetlands because no major earthwork-related construction, a potential issue for off-site wetlands if mismanaged, would take place at the Site under the Proposed Action.

Rehabilitation of Existing Station

Rehabilitating the existing Napa-Franklin Station would result in minimal to no impacts to wetlands because no wetlands are located on, or in close proximity to, the Property. Compliance with County and City water quality and soil erosion and control plans and permits (see Topography, Geology and Soils section) during construction would minimize any adverse impacts to off-site wetland resources. However, this is an urban area and such resources are at least 1 mile from the site.

Demolition with New On-site Station

Demolition, construction, and operation would likely require clearing site vegetation (some trees) and disturbing soils through grading and earth-moving activities. Without proper management, an increase in surface water runoff could occur, potentially affecting off-site wetlands. The developer and contractor, with assistance from USPS if necessary, would apply for and comply with all applicable Napa County soil and erosion control requirements and associated BMPs in the codes and associated plans and permits (see Topography, Geology and Soils section). These requirements include a soil and erosion control plan detailing the methods and techniques to be used to control erosion, sedimentation, and stormwater impacts from both construction, including: proposed site plans, applicable buffers, best management practices (e.g., the use of silt fencing), drainage plan, and other components. These are controls that also ultimately protect off-site wetland resources.

Demolition with New Off-site Station

Demolition measures are described in the above section. For the lease of existing space, such impacts are none to minimal. Should the rare case of more intensive work for the new site be required, USPS or site owner would follow the soil and erosion control plan requirements as specified within the Napa County Code, including specified BMPs, and ensure coverage under the appropriate Napa County Stormwater Management Program Permit for Stormwater Discharges from Construction Activity, to prevent any significant adverse impacts on water quality from runoff. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. In addition, USPS would follow the Cal EPA General Permit terms and conditions for soil and erosion control and stormwater management, controls that also ultimately protect off-site wetland resources.

No Action

The No Action alternative would have no impact to area wetlands since they are not in close proximity to the site. While other mild impacts to soil may be encountered over time with static conditions and only basic grounds maintenance, these are not expected to contribute to off-site wetlands degradation. .

Mitigation Measures for Wetlands

Proposed Action

No mitigation measures would be necessary during execution of the Proposed Action since no major earthwork-related construction would take place.

Other Alternatives

For demolition and construction efforts including the unlikely off-site major earthwork disturbance, USPS or site owner would follow the soil and erosion control plan requirements as specified within the Napa County Code, including specified BMPs, and ensure coverage under the appropriate Napa County Stormwater Management Program Permit for Stormwater Discharges from Construction Activity, to prevent any significant adverse impacts on water quality from runoff. Potential erosion from construction activities upslope from any water features (i.e., stormwater ponds/basins and wetlands) would be controlled by avoiding or minimizing construction traffic, planting a vegetative cover, and mulching or using erosion control blankets. In addition, USPS would follow the Cal EPA General Permit terms and conditions for soil and erosion control and stormwater management, controls that also ultimately protect off-site wetland resources.

No Action

The No Action alternative would have no impact to area wetlands since they are not in close proximity to the site. While other mild impacts to soil may be encountered over

time with static conditions and only basic grounds maintenance, these are not expected to contribute to off-site wetlands degradation. Thus, no mitigation measures for the No Action alternative are required.

Vegetation

The majority of the site is developed with ornamental trees and shrubs located within grassed areas along the perimeter of the building between the facility and streets/sidewalks on the site's north, east and west sides. An aerial photograph of the site showing the vegetated areas on the property is included in Figure 2. Vegetative resources appear to be standard for the area, with no rare or protected varieties.

Impacts to Vegetation

Proposed Action

The Proposed Action would not result in any significant impacts to vegetation because no major grounds-related construction would take place. Further, the existing facility is located in a heavily commercial, developed area with standard, marginal, vegetated areas.

Rehabilitation of Existing Station

The rehabilitation of the site would not result in any significant impacts to vegetation because although construction would take place, minimal vegetation clearing would be anticipated. It is assumed that rehabilitation plans would include saving the majority of the landscaping in its current state.

Demolition with New On-site Station

The demolition of the site would not likely result in significant impacts to vegetation if the new facility maintains the current building footprint and landscaping. If the new facility layout changes, on-site vegetation would need to be revised, at least in part; USPS would work with the City of Napa as necessary through landscaping/revegetation plans and a County-approved soil and erosion control plan to help protect vegetation.

Demolition with New Off-site Station

Demolition measures are described in the previous section. For the lease of existing space, such impacts would be none to minimal. Should the rare case of more intensive work for the new site be required, USPS or the site owner would work with the City of Napa as necessary through landscaping/revegetation plans and a County-approved soil and erosion control plan to help protect vegetation.

No Action

The No Action alternative would have no impact to site or area vegetation; USPS would conduct basic grounds maintenance (e.g., grass cutting and shrub and tree trimming).

Mitigation Measures for Vegetation

Proposed Action

The Proposed Action would not result in any significant impacts to vegetation because no major grounds-related construction would take place. Thus, no mitigation measures would be necessary under the Proposed Action.

Other Alternatives

For demolition and construction efforts including the unlikely off-site major grounds disturbance, the USPS or site owner would follow applicable City of Napa landscaping/revegetation plans and a County-approved soil and erosion control plan to help protect vegetation.

No Action

No mitigation measures are required since the No Action alternative would have no impact to site or area vegetation. As a routine practice, USPS would conduct basic grounds maintenance (e.g., grass cutting and shrub and tree trimming).

Wildlife Species/Endangered Species/Critical Habitat

While limited in scope due to the commercial, developed, urban setting, ornamental trees and shrubs located on site provide some limited habitat for a variety of wildlife species. A review of the United States Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) indicates that six endangered species, three threatened species, and 23 migratory birds managed and regulated by the USFWS may be present in the vicinity of the Project site. There are no wildlife refuges within the Project Area. Birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service. There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured. USPS is responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities (USFWS, 2015).

The USFWS endangered species include: the California Least Tern (*Sterna antillarum browni*), the California Freshwater Shrimp (*Syncaris pacifica*), the Conservancy Fairy Shrimp (*Branchinecta conservation*), the Contra Costa Goldfields (*Lasthenia conjugens*),

the Showy Indiana Clover (*Trifolium amoenum*), and the Salt Marsh Harvest Mouse (*Reithrodontomys raviventris*). The USFWS threatened species include: the Northern Spotted Owl (*Strix occidentalis caurina*), the Steelhead (*Oncorhynchus mykiss*), and the Delta Smelt (*Hypomesus transpacificus*). The migratory birds managed and regulated by the USFWS include: Bald Eagle (*Haliaeetus leucocephalus*), Bell's Sparrow (*Amphispiza belli*), Black Oystercatcher (*Haematopus bachmani*), Black Rail (*Laterallus jamaicensis*), Black-chinned Sparrow (*Spizella atrogularis*), Burrowing Owl (*Athene cunicularia*), the Common Yellowthroat (*Geothlypis trichas sinuosa*), Costa's Hummingbird (*Calypte costae*), Fox Sparrow (*Passerella iliaca*), Lawrence's Goldfinch (*Carduelis Lawrence*), Least Bittern (*Ixobrychus exilis*), Lesser Yellowlegs (*Tringa flavipes*), Lewis's Woodpecker (*Melanerpes lewis*), Loggerhead Shrike (*Lanius ludovicianus*), Marbled Godwit (*Limosa fedoa*), Nuttall's Woodpecker (*Picoides nuttallii*), Oak Titmouse (*Baeolophus inornatus*), Olive-sided Flycatcher (*Contopus cooperi*), Peregrine Falcon (*Falco peregrinus*), Short-billed Dowitcher (*Limnodromus griseus*), Short-eared Owl (*Asio flammeus*), Swainson's Hawk (*Buteo swainsoni*), and Tricolored Blackbird (*Agelaius tricolor*)⁵.

The Napa County Wildlife Conservation Commission has not identified any of the aforementioned threatened, endangered, and migratory birds located on the site, nor would any be expected given very limited habitat for long-term use. No unusual species, including amphibians, birds, crustaceans, fishes, flowering plants, mammals or migratory birds were noted on the site during the August 25, 2015 site visit, and are not expected to be present.

Impacts to Wildlife Species/Endangered Species/Critical Habitat

Proposed Action

The Proposed Action would not result in any significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site and since the proposed site work would be focused on the building. There would also be no anticipated impacts to other more common wildlife species, mostly common bird species for this setting.

Rehabilitation of Existing Station

The rehabilitation that would occur would not be expected to have any significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site and since site work would be mainly focused on the building, with limited earthwork for the seismic protective measures. There would also be no anticipated impacts to other more common wildlife species, mostly common bird species for this setting.

⁵ Source: United States Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) Trust Resource Report. 2015. <http://ecos.fws.gov/ipac/project/N45ANY7JCNADO6MF7RTI3JSGE/resources.pdf>.

Demolition with New On-site Station

The demolition that would occur is not expected to have a significant adverse impact to threatened, endangered, or migratory species resources due to their unlikely presence on site. The potential removal of shrubs and larger trees, if necessary, would temporarily remove limited habitat used primarily by more common bird species. Such species would commonly relocate temporarily to nearby vegetated areas.

Demolition with New Off-site Station

Demolition measures are described in the above section. For the lease of existing space, such impacts would be none to minimal. The off-site location would be in the vicinity of the current Station and would likely only involve renovations to an existing building. Should the unlikely case of more intensive work for the new site be required, as with the previous section, only more common bird species may be temporarily impacted.

No Action

The No Action alternative, involving static grounds conditions, would have no impact to site threatened, endangered, or migratory species resources.

Mitigation Measures for Wildlife Species/Endangered Species/Critical Habitat

Proposed Action

No mitigation measures would be necessary for the Proposed Action because restoration activities would be limited mainly to the building an endangered species/critical habitat resources are unlikely to be present on site. USPS is responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities

Other Alternatives

For the alternatives involving demolition and construction to impact grounds, the potential removal of shrubs and larger trees, if necessary, would temporarily remove limited habitat used primarily by more common bird species. Such species would commonly relocate temporarily to nearby vegetated areas. USPS or the site owner would work with the City and County to restore or replant any lost vegetation to the extent practicable given future site plans. USPS or the site owner would be responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

No Action

The No Action alternative, involving static grounds conditions, would have no impact to site wildlife species/endangered species/critical habitat, so no mitigation measures are required.

Cultural Environment

Historical and Archaeological Resources

The Napa-Franklin Station was constructed in 1933. The Art Deco style building, designed by local architect William H. Corlett, was listed in the NRHP in 1985 under Criterion C as a significant example of a Federal Art Deco (also known as Stripped Classicism) building (NRIS #85000133). In 2015, the NRHP nomination of the building was amended after the building was damaged by a 6.0 earthquake on August 24, 2014. While there was damage to several character-defining features including brickwork, terracotta, windows, and marble wainscoting, the amendment stated, "...the 2014 earthquake damage did not significantly affect the property's exterior architectural integrity of design, workmanship, materials, and location. The property continues to meet Criterion C for listing in the NRHP because the qualities which caused it to be originally listed are still conveyed" (Brunzell & Mates 2015).

In June 2015, USPS engaged an outside consultant, Tetra Tech, to evaluate historic properties in the Area of Potential Effects (APE) of the project. The consultant reviewed records, previous historical surveys including City of Napa Survey Reports, Historic Structures Inventories (the first inventory was done 1969, followed by surveys conducted in 1978, 1988, 1994, 1995 and 1998), and maps of the area. A records search was conducted at the Northwest Information Center at California State University, Sonoma, on April 10, 2015. The search found no previously recorded archaeological sites within or adjacent to the APE. All of the records above identified 10 buildings within the APE. Five properties have been previously determined not eligible for the NRHP (one building has been determined eligible for listing in a local register only) and two buildings have not been previously evaluated.

Two of the ten buildings are eligible for listing in the NRHP. The Uptown Theater at 1332-1364 Third Street was constructed in 1935 and is an example of a Prohibition and Depression Era commercial building in Downtown Napa with Art Deco style. The theater was already recognized as an historic resource and was not further documented as part of the Downtown Napa Intensive-Level Survey. This property is eligible for listing in the NRHP as the property has exceptionally high architectural merit, and/or was designed by a master architect (USPS 2015a).

The Robert Sterling House at 833 Franklin Street was constructed in 1872 and is an example of an Italianate villa. The House was already recognized as an historic resource and was not further documented as part of the Downtown Napa Intensive-Level Survey.

This property is eligible for listing in the NRHP as the property has exceptionally high architectural merit, and/or was designed by a master architect.

USPS voluntarily complies with Section 106 of the National Historic Preservation Act, which requires certain federal agencies to consider the impacts that certain projects may have on properties or resources listed in the NRHP or those that are eligible for such listing. Such resources in the vicinity of the project in Napa that could be affected by the Proposed Action or other alternatives under consideration, including historic buildings and structures and potential areas of archaeological resources, are discussed in the following sections.

In June 2015, USPS initiated consultation with the California Office of Historic Preservation and Advisory Council on Historic Preservation (ACHP) regarding potential demolition of the Napa-Franklin Station. In July 2015, the Office of Historic Preservation responded to the initial consultation letter and USPS subsequently received public comments on its original proposal. In response to this communication and public input, on September 9, 2015 USPS submitted a letter to the Office of Historic Preservation indicating that it was exploring the sale of the property instead of demolition (USPS, 2015b). The letter also included a draft of an historic preservation covenant that would be included as part of any potential sale of the Napa-Franklin Station building and property. The covenant includes significant historic interior and exterior features that should be preserved. USPS will continue to consult with the California Office of Historic Preservation and the Advisory Council on Historic Preservation to resolve any potential adverse effects on historic resources. The letter and draft covenant are included in Appendix C.

Impacts to Historical and Archaeological Resources

Proposed Action

Section 106 of the National Historic Preservation Act (NHPA) regulations 36 CFR 800.5(a)(2)(vii) provides “the transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance” as an example of an adverse effect. Therefore, as part of the disposal, USPS will impose a preservation covenant upon the property and building at the closing of any possible sale to avoid adverse effects on this historic property. The Napa-Franklin Station is expected to be disposed of to an as-yet undetermined buyer. The buyer of the property would be responsible for adhering to the conditions of the protective covenant, which would ensure that significant historic features of the facility are preserved, rehabilitated and/or restored in accordance with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties*. Implementing the Proposed Action with the protective covenant would constitute a no adverse effect under Section 106.

The Proposed Action would have minimal or no impact on the historic properties in the vicinity at 1332-1364 Third Street (Uptown Theater) and 833 Franklin Street (Robert Sterling House) as no significant changes to the Napa Franklin Station or its setting

would occur from the property transfer. Any changes to the building would be governed by the proposed preservation covenant.

Rehabilitation of Existing Station

Rehabilitating the existing Napa-Franklin Station involves two components: rehabilitation of the building to pre-earthquake conditions and seismic retrofitting and handicap accessibility updates. Rehabilitation of the building would follow the *Secretary of the Interior's Standards and Guidelines Properties*, as interpreted and amended by the California State Historic Preservation Officer and would result in no adverse impacts. In addition, this alternative would have minimal or no impact on the other historic properties in the vicinity as no significant changes to the Napa Franklin Station or its setting would occur from the rehabilitated building and property.

There are no known archaeological sites within the APE. However, should additional construction occur that involves ground disturbance in previously undisturbed areas, archaeological inquiry may need to be addressed.

Demolition with New On-site Station

Implementing this alternative would be considered a significant impact since it would alter the physical character of the historic property and demolition is considered adverse and irretrievable. USPS has determined that demolition of the Station and construction of a new facility on the same site would have no adverse impact on adjacent historic properties from altering the historic character of their setting. The alteration of the setting would not constitute an adverse effect as the properties would retain their eligibility for listing in the NRHP.

There are no known archaeological sites within the APE. For any ground disturbance in previously undisturbed areas, archaeological inquiry may need to be addressed, in consultation with SHPO.

Demolition with New Off-site Station

Demolition measures are described in the above section. For the lease of existing space, such impacts would be none to minimal. USPS would likely lease a facility that is already constructed prior to occupation and any renovations to adapt to USPS use the space would likely be only to the building interior.

No Action

The No Action alternative would result in impacts to the historic Station and aesthetically to its historic surroundings through the continued deterioration of the historic, earthquake-damaged Napa-Franklin Station structure and property. USPS would only conduct basic building maintenance.

Mitigation Measures for Historical and Archaeological Resources

Proposed Action

For the Proposed Action, no mitigation measures would be necessary as the site would be disposed of subject to a preservation covenant.

Other Alternatives

For the Rehabilitation of Existing Station alternative, no additional mitigation measures would be necessary as the work would be conducted according to the *Secretary of the Interior's Standards and Guidelines*.

For any on-site alternative involving demolition and/or new construction on-site, USPS would consult with the California Office of Historic Places and other interested parties in accordance with Section 106 to develop and implement appropriate mitigation measures to mitigate the adverse effect.

For the off-site Station alternative, lease of existing space, such impacts are none to minimal. USPS would likely lease a facility that is already constructed prior to occupation and any renovations to adapt the space to USPS use would likely be only to the building interior, requiring no mitigation measures.

No Action

There are no viable historic resources mitigation measures for the No Action alternative, hence the Proposed Action. USPS would only conduct basic building maintenance and the continued deterioration of the historic, earthquake-damaged Napa-Franklin Station structure and property would ensue.

Local Employment and Economics/Relocation

The Napa-Franklin Station is located in Napa City, Napa County, California. The official City population in 2000 was 102,282 and increased to approximately 115,175 by 2010. The official County population in 2000 was 124,279 (U.S. Census, 2000) and increased to approximately 136,484 by 2010 (U.S. Census, 2010). According to an official population estimate conducted by the California Finance Departments (CAFD) Demographic Research Unit (DRU), Napa County's population is estimated to increase to 140,362 by January 1, 2015, a 3% increase from 2010 levels.

Employment in Napa County in 2010 reached 106,762 jobs, a 25% increase from 2000. Employment in the county has been increasing at a greater rate than the growth of the population (U.S. Census, 2010a). According to the CAFD DRU, the Grape and Wine Industry comprises the largest manufacturing sector in Napa County. As reported by the 2010 Census, approximately 7.8% of the 115,175 population are unemployed within the City.

Impacts to Local Employment and Economics/Relocation

Proposed Action

Since the earthquake in March 2014, the Napa-Franklin Station facility has been shut down for business and temporary USPS facilities were set up nearby. Once sold, the Proposed Action would have little to no impact on local employment and economics because it is expected that the temporary facility would remain open. Redevelopment of the site by a future buyer would likely have a modest increase in local employment from any new businesses occupying the site. For a private sector buyer, the City would collect real estate tax revenue since USPS is not subject to such taxes.

Rehabilitation of Existing Station

Restoring the building to its pre-earthquake condition would have no impact on the local employment and economy of Napa because it would allow the existing Napa-Franklin Station facility to be reopened for business, restoring staff from the nearby temporary facility back the Station.

Demolition with New On-site Station

Demolishing the building and constructing a new on-site Post Office would have no impact on the local employment and economy of Napa because a new Station would be constructed and reopened for business, restoring staff from the nearby temporary facility back to the Station.

Demolition with New Off-site Station

No impacts would occur under this alternative. A new, off-site facility, like through lease of existing building space, would be located nearby in Napa and therefore existing USPS employees could easily relocate from their current positions at the temporary facility in Napa.

While it is too speculative at this stage to determine the use of the vacant site post-demolition, the use would be anticipated to be aligned with surrounding commercial use, thus likely adding to future local employment opportunities.

No Action

The No Action alternative would have minimal to no impact to local employment and economics. While there would be no change in the current local employment situation, degradation of the Station over time could adversely impact the commercial surroundings economically.

Mitigation Measures for Local Employment and Economics/Relocation

Proposed Action

No mitigation measures would be necessary from implementation of the Proposed Action because no adverse impacts to the economy or local employment would occur.

Other Alternatives

No mitigation measures would be necessary during construction or operation of any of the rehabilitation or demolition/construction/lease alternatives because no significant impacts to the local employment and economy would occur. There may be temporary additional demolition and construction contractor local employment, but for long-term operations, Postal staff resources and general services are likely to stay similar to the past scenario.

No Action

No mitigation measures would be necessary for the No Action alternative.

Environmental Justice

Federal agencies are required to consider Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, in their project development efforts. This order requires that each agency must, to the extent practicable, make achieving “environmental justice” part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. The Hispanic or Latino population is approximately 32.5% of the total Napa City population. Approximately 10.4% of the total Napa City population resides below the poverty level.

Impacts to Environmental Justice

Proposed Action

No aspects of the Proposed Action would result in disproportionately high or adverse human health or environmental effects on low-income or minority populations. Therefore, impacts related to environmental justice would not occur and no further analysis related to environmental justice concerns is necessary.

Rehabilitation of Existing Station

No environmental justice impacts would result from this alternative because it would not result in disproportionately high and adverse human health or environmental effects on low-income or minority populations.

Demolition with New On-site Station

No environmental justice impacts would result from this alternative because it would not result in disproportionately high and adverse human health or environmental effects on low-income or minority populations.

Demolition with New Off-site Station

No environmental justice impacts would result from this alternative because it would not result in disproportionately high and adverse human health or environmental effects on low-income or minority populations. Further, USPS has set service jurisdictional requirements within local communities, including Napa City. Therefore, relocation of the facility would be in close proximity to the current service jurisdiction.

No Action

The No Action alternative would have no impact for the area of Environmental Justice. However, it should be noted that likely continued degradation of the unoccupied, earthquake-impacted Station offers no asset to the community.

Mitigation Measures for Environmental Justice

No mitigation measures apply to any of the alternatives. While no mitigation is possible under ‘No Action’ (hence the Proposed Action), it should be noted again that No Action supports continued degradation of the unoccupied, earthquake-impacted Station, offering no asset to the community.

Land Use and Zoning

The Napa-Franklin Station site and surrounding area is zoned by the City of Napa as Downtown Public (DP)⁶. The Downtown Public zoning district and land use designation provides for public and quasi-public uses dedicated to community-serving purposes such as government offices and related community service facilities. This district also allows for appropriately located public lands devoted to public open spaces and trails.

General land use in the vicinity of the Napa-Franklin Station site is dominated by commercial/public and mixed uses, with some light residential uses. While the Napa-Franklin Station site is located in the Downtown Public district, the rest of the area on both sides of Second Street and the south side of Third Street is designated as Downtown Mixed-Use. The site is bound to the north by offices, a parking lot, and a retail shop; to the northeast by a parking lot; to the east by Randolph Street, beyond which is a parking lot, a hotel, and the USPS Wine Valley Box Unit (820 Randolph Street, Napa, CA 94559); to the south by a hardware store, a nail salon and framing shop, and the Uptown

⁶Napa Municipal Code Title 17, Zoning Chapter 17.16.010. Specific Purposes (2015).

Theater; to the southwest by office buildings and residential apartments; to the west by Franklin Street and multiple retail units, including a dry cleaner; and to the northwest by a restaurant and other retail units. Land uses within a two- to three-block vicinity of the Napa-Franklin Station site are shown in **Figure 3**.

The Napa City General Plan serves as a broad framework for planning the future of the City. The General Plan is a 20-year plan that guides the long term growth and physical development of the City. The General Plan includes land use goals and policies addressing preservation of the City's historic resources. The primary goal of the Historic Preservation element of the Plan is to "preserve and maintain sites, buildings, and landscapes that serve as significant, visible reminders of the City's social, architectural and agricultural history" (City of Napa, 1998)⁷.

In 2012, the City adopted a "Specific Plan" pursuant to the State of California planning and zoning laws for the downtown area (City of Napa, 2012). The primary goal of the Specific Plan is to revitalize downtown Napa into a vibrant place where residents and visitors come together to work, live, play and actively engage in the community. Overarching land use policies to achieve this goal include: (1) Revive Downtown as the primary job center in Napa; (2) Celebrate Napa's rich history and agricultural heritage; (3) Promote the downtown as the primary place where civic buildings are concentrated; (4) Build on Napa's inventory of historic structures to set the tone for downtown design; and (5) Reuse, rehabilitate and restore buildings and/or building elements wherever practical and feasible.

Impacts to Land Use and Zoning

Proposed Action

The Proposed Action would not result in significant adverse impacts on land use and zoning. Under the Proposed Action, any buyer would be expected to comply with current or future zoning regulations.

Rehabilitation of Existing Station

Rehabilitation of the Napa-Franklin Station would not result in any adverse impacts on land use and zoning. The facility would comply with the existing Downtown Public land use district and zoning requirements already established on the site, particularly since Postal operations would resume, in accordance with applicable law and USPS policy.

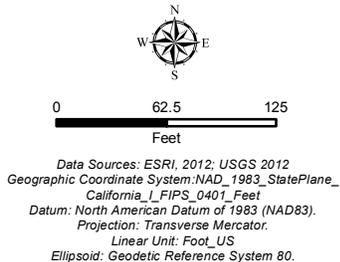
⁷ City of Napa General Plan, 1998.



Legend

- Franklin Station Site
- Observed Land Use

Note, observed land use determined during August 2015 site visit.



**US Postal Service
Environmental Assessment
Napa-Franklin Station
Napa, California**

Figure 3. Land Uses in the Project Vicinity



Demolition with New On-site Station

Impacts on land use and zoning from this alternative would be similar to the rehabilitation alternative. However, this alternative would be in conflict with one of the overarching goals and policies of the Downtown Napa Specific Plan, '(4) Build on Napa's inventory of historic structures to set the tone for downtown design.' However, it does satisfy item 3 of the Plan, 'Promote the downtown as the primary place where civic buildings are concentrated.'

Demolition with New Off-site Station

Impacts under this alternative are similar to the above section, although the likely lease of space in an existing building off-site would be in close enough proximity to fit the Plan coverage for the immediate land use and zoning. For any new off-site location, USPS would ensure compatibility with local land uses and zoning requirements in accordance with applicable law and USPS policy.

No Action

While not direct land use and zoning impacts, continued deterioration of the structure and grounds under the No Action alternative would likely be in violation of City of Napa building and land use codes, and fire and safety codes and regulations.

Mitigation Measures for Land Use and Zoning

Under all alternatives with the exception of the No Action alternative, impacts are not expected due to presumed compliance with existing Downtown Public land use district and zoning requirements already established on the site. City Plan tenets have conflicting impacts given historic and civic goals mentioned in sections above, but again, all non-No Action alternatives would be expected to be compliant with Downtown Public land use district and zoning requirements already established on the site. Thus, provided land use and zoning is adhered to, no mitigation measures are required.

No Action

The No Action alternative cannot support any mitigation measures as static conditions would support further deterioration of the unoccupied, earthquake-damaged building.

Visual Resources/Aesthetics

The feel of the general vicinity is that of a typical small city downtown. As discussed in the Land Use and Zoning section, the Station facility and general vicinity is dominated by commercial/public use development. The USPS facility is located in the middle of land use districts designated by the City of Napa as Downtown Mixed-Use. The area to the south and east of Napa-Franklin Station is largely dominated by the Downtown Neighborhood and other Downtown Public districts and associated uses. Napa's primary

commercial area (i.e., the Downtown Commercial Core district) is located north of the USPS facility and north of First Street.

While considered by many to be an important component of Napa's downtown area, views of the Napa-Franklin Station are generally limited to the immediate vicinity of the property. Vehicles or pedestrians traveling along 2nd Street which borders the site to the north, are able to view the façade of this historic Art Deco USPS building. Vehicles and pedestrians traveling along Randolph Street, which borders the site on the east, and Franklin Avenue, which borders the site on the west, are able to see the side entrances of the facility. There are generally no or limited views of the site from other roads (e.g., 3rd Street, located south of the site) and glimpses of part of the structure and property through gaps in neighborhood buildings. For example, looking southeast from the north side of First Street in the middle of the block between Franklin and Randolph streets through the gap between Subway Sandwich Shop and Annette's Chocolate Factory, one can see the top of the north facing façade of the USPS facility (see Figure 3). In addition to being obstructed by buildings, views of the site are further limited by the vegetation on the USPS property.

Impacts to Visual Resources/Aesthetics

Proposed Action

Implementing the Proposed Action would involve limited construction focused on a buyer's restoration under a protective historic covenant; therefore, no long-term, significant adverse impacts on visual resources/aesthetics would occur. The protective covenant would ensure that a future buyer would retain and restore the existing historic facility and property would be restored, thereby maintaining the current views and general aesthetics of the area and neighborhood.

Rehabilitation of Existing Station

This alternative would not result in significant adverse aesthetic or visual impacts. Rehabilitation of the new Napa-Franklin Station by USPS, including seismic efforts, could slightly alter the aesthetics of the site, but the appearance of the rehabilitated facility would be expected to remain generally the same and would actually improve over the current views of the damaged structure. Few, if any, vantage points to or from construction and operation of the proposed facility would change. It is likely that a building setback and a natural or landscaped buffer setback would be maintained from 2nd Avenue, Randolph Street, and Franklin Avenue. A combination of natural buffer and new landscaping would block most views of the facility from the adjacent streets. The use of the site as a Postal facility is consistent with the County's current and future land use plans. Potential impacts from shadows along the existing, rehabilitated facility pose minimal to no impact due to the low height of the existing building.

Demolition with New On-site Station

Demolition of the existing Station and construction of a new facility on the site would alter the aesthetics of the site and immediate site vicinity. It is unlikely that a new modern facility constructed on the site would provide the same appearance and aesthetic feel that the original Napa-Franklin Station has provided since 1933. However, assuming the new facility would be constructed to be generally the same size and height of the existing building, and landscaping is either retained or replanted, few vantage points to or from the site would be affected. Similarly, potential significant impacts from shadows from a new facility would be expected to pose minimal to no impact due to the likely low height of a new building.

Demolition with New Off-site Station

Demolition of the Station would result in an adverse impact to the aesthetics of the site and immediate site vicinity due to appearance of the post-demolition vacant site. The likely lease of space in an existing building off-site would not impact the immediate aesthetics as no major exterior work to the existing space would be likely.

No Action

The static No Action alternative would impact site and local aesthetic/visual resources as the continued deterioration of the unoccupied, earthquake-damaged facility would be expected.

Mitigation Measures for Visual Resources/Aesthetics

Proposed Action

No mitigation measures would be necessary to implement the Proposed Action as it would involve limited construction focused on a buyer's restoration under a protective historic covenant; therefore, no long-term, significant adverse impacts on visual resources/aesthetics would occur.

Rehabilitation of Existing Station

No mitigation measures would be necessary under this alternative since the appearance of the rehabilitated facility would be expected to remain generally the same and would actually improve over the current views of the damaged structure.

Demolition with New On-site Station

Station demolition with construction of new Station on site does merit mitigation for aesthetic/visual impacts. USPS would work with the City to comply with applicable development standards and other landscaping measures in accordance with applicable law and USPS policy.

Demolition with New Off-site Station

This alternative would likely ultimately require the same mitigation as described in the above section (for demolition and ultimately re-development), but the use of the vacant, post-demolition lot cannot be determined at this time. For the off-site Station, likely a lease at an existing building, mitigation measures are not anticipated as the exterior would likely not be altered.

No Action

The static ‘No Action’ alternative does not support mitigation measures (hence the Proposed Action). Although not a ‘mitigation measure,’ USPS would conduct basic maintenance on the unoccupied, earthquake-damaged Station.

Noise

Noise in the immediate vicinity of the Napa-Franklin Station site is characterized by typical “downtown” sounds, primarily from traffic along Second Street to the north, Randolph Street to the east, and Franklin Street to the west. The closest sensitive receptors to the site (two residences and an apartment building at the intersection of Franklin Street and Third Street) are nearly 270 feet from the site. The rest of the immediate site vicinity is composed primarily of commercial business and parking lots.

Impacts to Noise

Proposed Action

The Proposed Action would not result in any long-term, significant noise impacts on sensitive receptors or otherwise increase ambient noise levels in the area given that a future buyer would restore the Station to its similar pre-earthquake stature as a historic resource. The future use plans would be aligned with City land use and zoning requirements, which would allow for uses with acceptable noise levels given the surroundings. Construction work will be focused mainly on the building, will be short-term, and in compliance with City noise code requirements.

Rehabilitation of Existing Station

The construction component of this alternative is similar to the section above, and the continued USPS use of the Station would not have any impacts to noise in the area as the operation would be restored to its pre-earthquake capacity.

Demolition with New On-site Station

Construction noise impacts from this alternative would be similar to those under the above two alternatives. However, the construction phase would be expected to be longer for the new on-site Station effort. As with the rehabilitation alternative above, the

continued USPS use of the Station would not have any impacts to noise in the area as the operation would be restored to its pre-earthquake capacity.

Demolition with New Off-site Station

Demolition noise impacts from this alternative would be similar to those under all other demolition alternatives. For long-term noise impacts, while the use of the vacant, post-demolition lot cannot be determined at this time, it would be expected to be aligned with City land use and zoning requirements, which would allow for uses with acceptable noise levels given the surroundings.

For the off-site Station, likely a lease at an existing building, mitigation measures are not anticipated as the exterior would likely not be altered and the new location would be aligned with City land use and zoning requirements, which would allow for uses with acceptable noise levels given the surroundings, presumably commercial.

No Action

The No Action alternative would not result in noise impacts on or near the unoccupied site because no construction or other notable noise production would take place.

Mitigation Measures for Noise

For all alternatives involving any demolition and/or construction, impacts from construction noise would be short-term and mitigated by compliance with City noise code requirements (City of Napa Municipal Code, Chapter 8.08). Typical requirements include limiting construction activity to daytime hours (generally 7:00 a.m. to 6:00 p.m.) and ensuring vehicles and equipment are maintained for the minimum possible noise impacts.

For the Proposed Action and Demolition with Off-site Station alternatives, the future site use would be expected to be aligned with City land use and zoning requirements, which would allow for uses with acceptable noise levels given the surroundings. Any mitigation measures for these long-term uses would be determined between the end-user and City.

For the rehabilitation and new on-site Station alternatives, no mitigation measures for operations would be required as the USPS use would continue as it existed pre-earthquake.

No Action

No mitigation measures would be necessary for the No Action because no notable noise would result with this static plan.

Hazardous Materials and Waste

An environmental disposal due diligence investigation and site reconnaissance of the Napa-Franklin Station building and grounds was conducted on August 25, 2015 by USPS's environmental consultant, Louis Berger (USPS, 2015c). Based on the data obtained during the site reconnaissance, review of maps and photographs, review of the Environmental Data Resources, Inc. (EDR) Radius Map™ Report with GeoCheck® and the EDR NEPACheck® report, and interviews with property owners and persons familiar with the site and its history, Louis Berger identified the following environmental findings:

The Napa-Franklin Station site address was listed in six of the EDR Databases included within the Radius Map™ Report with GeoCheck® report:

- Underground Storage Tank (UST), Leaking Underground Storage Tank (LUST), and Historical hazardous waste and substance listed sites (HIST CORTESE): The Site is listed in the UST database for a heating oil tank of unknown capacity that was removed from the Site in 1990. The site is listed in the LUST and HIST CORTESE databases due to a leak associated with this UST that was discovered during removal activities. According to the EDR Database report and the California State Water Resources Control Board (CA SWRCB) GeoTracker web site, a site investigation and subsequent remediation were conducted as a result of this leak, and a NFA letter was issued to USPS on 7 January 1997. Based on this information, no additional impact to the Site is expected.
- Recovered Government Archive Leaking Underground Storage Tank (RGA LUST): The site is listed as an RGA LUST site for the years 1992 through 2012. Louis Berger was unable to find any additional information related RGA LUST status for the site, and the CA SWRCB could not provide any additional information either. It seems likely that this designation is related to the LUST listing described above, but no further information regarding this designation was available.
- Facility and Manifest Data (HAZNET): There are two (2) HAZNET records for the site is listed in the EDR Database report; one (1) from 2000 for the disposal of 1.68 tons of asbestos-containing waste; and one (1) from 2001 for the off-site disposal of 33.71 tons of asbestos-containing waste and 0.84 tons of inorganic solid waste. No impact is expected from these designations.

During site inspection, Berger observed staining of bricks in the boiler pit in the basement; USPS is further investigating this condition.

The site is serviced by a sanitary sewer system operated by the City of Napa. Wastewater is not currently generated at the Site. Universal waste, such as florescent bulbs, is stored in Room B12 in the basement. Per USPS personnel at the site, the used bulbs were periodically taken to a hazardous waste collection facility in the town of American

Canyon, CA. There are currently no plans to dispose of the bulbs currently present at the Site. Municipal waste is disposed by the City of Napa.

Per the 1998 Asbestos and Lead-Based Paint Investigative Survey conducted by Hygienetics Environmental Services, Inc. (HES, 1998) for USPS, asbestos-containing material (ACM) is present in the 12-inch off-white with gray and black streaks vinyl floor tile and associated mastic, 9-inch cream with gray streaks floor tile and associated mastic, 9-inch maroon with cream streaks floor tile and associated mastic, 9-inch gray with cream and black streaks floor tile and 12-inch beige with brown specks floor tile. Additionally, suspect ACM pipe insulation was observed on the pipes in the chases between the men's and women's restrooms in the basement. Approximately 60 square feet of ACM floor tile in the vicinity of one of the sewer cleanout access points in the basement was observed to be damaged during the site visit. All other ACM was observed to be in good condition. Additionally, there were several boxes of asbestos floor tiles and asphalt joint material stored in the Custodian's Shop.

Per the 1998 Asbestos and Lead-Based Paint Investigative Survey lead-based paint (LBP) is present on the door frame in the boiler room shop (cream paint), the bottom half of the stairs and walls (pink paint), the top half of the stairs and walls (off-white paint), and on the basement storage room door frame (olive green paint). The LBP was observed to be damaged in several locations during the site visit.

No polychlorinated biphenyl (PCB)-containing electrical equipment was observed onsite.

Impacts to Hazardous Materials and Waste

Proposed Action

Based on the information presented above, the Proposed Action would not result in any significant impacts on existing hazardous materials, nor would it increase the amount of hazardous materials used, stored, or accumulated on the Station. The purchaser of the property would need to manage and/or dispose of hazardous materials in accordance with applicable federal, state, and county regulations and requirements.

Rehabilitation of Existing Station

Based on the information presented above, this alternative would not result in any significant impacts on existing hazardous materials, nor would it significantly increase the amount of hazardous materials used, stored, or accumulated on the Franklin Station site. Similarly, any ACM or LBP that would be disturbed during project rehabilitation or construction would be handled according to specifications contained in the appropriate construction contracts and in accordance with all applicable federal, state, and county regulations and requirements and USPS policy to minimize any potential adverse impacts. Disposal of rehabilitation waste would be done in accordance with all applicable federal and state regulations and USPS policy.

Hazardous substances and wastes at the rehabilitated Station site would continue to be managed in accordance with federal, state, and county regulations and requirements and the facility's Hazardous Waste Management Plan. The management plan would be updated to incorporate any new storage areas or equipment associated with hazardous substances, such as new boilers, tanks, equipment, and storage rooms. Any new tanks that may be installed would be managed, registered, and operated under applicable federal, state, and county regulations and requirements. In addition, USPS would continue to conduct periodic Environmental Compliance Reviews (ECRs) of the Site to identify and correct any hazardous waste compliance issues at its facility.

Demolition with New On-site Station

Impacts from hazardous materials under this alternative would be generally similar as the rehabilitation alternative, however more potential impacts and materials management and disposal concerns would occur during the demolition component of this alternative. In particular, potentially harmful fugitive dust emissions could occur during project demolition. However, any ACM or LBP that would be disturbed during project demolition or construction would be handled according to specifications contained in the appropriate construction contracts and in accordance with all applicable federal, state, and county regulations and requirements and USPS policy to minimize any potential adverse impacts. Disposal of demolition and construction waste would be done in accordance with all applicable federal and state regulations and USPS policy. Hazardous substances and wastes at the new on-site Station site would continue to be managed in accordance with federal, state, and county regulations and requirements and the new facility's Hazardous Waste Management Plan. In addition, USPS would coordinate with Napa County to determine if the resumed operation in a new on-site Station would require a change in its RCRA generator status (which is unlikely) and, if needed, will obtain a new or revised license as appropriate. USPS would also continue periodic Environmental Compliance Reviews (ECRs) of the Site as discussed previously.

Demolition with New Off-site Station

Demolition impacts for this alternative are described in the above section. For the new, off-site Station, likely lease of an existing building space, impacts from hazardous materials would be little to none. Such new space has stringent hazardous materials lease terms and USPS seeks to secure such new space free from ACM, LBP, or other hazards.

No Action

While, under the No Action alternative, USPS basic maintenance will include regular inspection of the Station and grounds and minimal maintenance, long-term deterioration of the unoccupied, earthquake-damaged Station could exacerbate further damage of materials, including those containing asbestos and lead-based paint.

Mitigation Measures for Hazardous Waste and Materials

All alternatives, with the exception of the No Action alternative, will be carried out in compliance with all local, state, and federal hazardous waste and materials requirements and USPS policy.

No Action

While not a mitigation measure, only USPS's basic Station maintenance under the No Action alternative will manage impacts from hazardous wastes and materials. USPS would not be able significantly prevent future Station deterioration under the No Action alternative (hence the Proposed Action).

Transportation

The Napa Franklin-Station site is located along downtown Napa city streets in an area dominated by commercial/public uses accessible via walking or vehicle traffic. The existing Station site is generally bounded to the north by Second Street, offices, a parking lot, and a retail shop; to the northeast by a parking lot; to the east and northeast by Randolph Street, beyond which is a parking lot, a hotel, and the USPS Wine Valley Box Unit; to the south by Third Street, a hardware store, a nail salon and framing shop, and the Uptown Theater; to the southwest by office buildings and residential apartments; and to the west by Franklin Street and multiple retail units. Traffic flow in the immediate vicinity of the site is generally in both directions, however Third Street to the south is a one-way road (heading southwest).

Open parking lots are present along several streets in the vicinity of the site. Although the Napa-Franklin Station is presently closed, parking for customers and site visitors is available in front of the building along Second Street as well as all adjacent side streets and local parking lots.

Vehicles, traffic, parking, and street and sidewalk use in downtown Napa are governed by Chapters 10 and 12 of the Napa municipal code. The City has developed the *Citywide Guidelines for Traffic Calming and Neighborhood Traffic Management* (City of Napa, 2005). These policy guidelines provide a framework for the potential selection, funding, application, and design of traffic calming measures in the City of Napa.

Impacts to Transportation

Proposed Action

The Proposed Action would not result in any significant impacts to the roadway network, public transportation, parking, or pedestrian use at or in the near vicinity of the Napa-Franklin Station. Future use of the building by a potential buyer is unknown, but the buyer would be expected to comply with the City of Napa transportation-related regulations. The future use plans would be aligned with City land use and zoning

requirements, which would allow for uses with acceptable transportation impacts given the surroundings.

Construction work will be focused mainly on the building, will be short-term, and in compliance with City traffic requirements, so construction impacts are not anticipated.

Rehabilitation of Existing Station

Construction-related impacts under this alternative would be similar to the above section. Once the facility is rehabilitated and reopened, traffic in the area and parking for the Station would be expected to be similar to that experienced while the Station was operational.

Demolition with New On-site Station

Construction-related impacts under this alternative would be similar to the above sections, but would be longer in duration and include demolition efforts. Once the facility is newly constructed and reopened, traffic in the area and parking for the Station would be expected to be similar to that experienced while the Station was operational.

Demolition with New Off-site Post Station

Demolition impacts under this alternative would be similar to the above sections, but shorter in duration for demolition only. While no additional USPS construction or operations would occur at the site following demolition and future use of the site cannot be determined, it would be expected to comply with the City of Napa transportation-related regulations. The future use plans would also be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings.

For the off-site Station, likely a lease at an existing building, transportation impacts are not anticipated as the new location would be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings, presumably commercial/public use.

No Action

The No Action alternative would have no impact to site or area transportation because the Station would remain unoccupied.

Mitigation Measures for Transportation

For all alternatives involving any demolition and/or construction, impacts from these activities would be short-term and mitigated by compliance with City of Napa transportation-related regulations. Typical measures include working with the City of Napa to coordinate work hours, construction schedules, safety controls, and any needed traffic diversions to minimize impacts on travelers and pedestrians in the area.

For the Proposed Action and Demolition with Off-site Station alternatives, the future site use would be expected to be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings, presumably commercial. Any mitigation measures for these long-term uses would be determined between the end-user and City.

For the rehabilitation and new on-site Station alternatives, no mitigation measures for operations would be required as the USPS use would continue as it existed pre-earthquake.

No Action

No mitigation measures would be necessary for the No Action alternative because the Station would remain unoccupied.

Parks and Recreation

There are no recreational opportunities available to the public on or in the immediate vicinity of the Napa-Franklin Station site. The closest recreational opportunity to the site is Veterans Memorial Park, a City of Napa-owned park located east of Main Street, approximately 0.2 mile east of the site (see Figure 2). Other recreational opportunities within approximately 1 mile of the Franklin Station include: Napa Skate Park and Point Park to the north; Fairview Park and Napa Fairgrounds to the east; South Park and Riverside Park to the south; and Fuller Park to the southwest.

Impacts to Parks and Recreation

Proposed Action

The Proposed Action would have no adverse impacts on any of the Napa-Franklin Station area parks or other recreational facilities or opportunities during disposition.

Other Alternatives

The alternatives would have no adverse impacts on any of the Franklin Station area parks or other recreational facilities or opportunities during construction or operation.

No Action

The no action alternative would have no impact to area parks and recreation because no construction would take place.

Mitigation Measures for Parks and Recreation

Proposed Action

No mitigation measures would be necessary for the Proposed Action.

Other Alternatives

No mitigation measures would be necessary for any of the other alternatives.

No Action

No mitigation measures would be necessary for the no action alternative because no impacts would occur.

Community Services

Community services include fire and life safety, law enforcement, and schools. The Napa Fire Department provides fire and life safety services to the Station and vicinity. The fire department is a volunteer, paid-per-call agency with four stations located throughout the city. The station closest to the Franklin Station site is located at 1539 First Street, located approximately 0.1 mile northwest of the Franklin Station.

The Napa City Police Department station is also located at 1539 First Street. The department provides law enforcement services in the vicinity of the Napa-Franklin Station.

The closest school, the Blue Oak private school, is located approximately 0.2 mile northwest of the Napa-Franklin Station site. Other schools within approximately 1 mile of the site include Saint John the Baptist Catholic School, Shearer Elementary School, New Technology High School, Napa Christian Campus, and Harvest Middle School.

Impacts to Community Services

Proposed Action

No significant impacts on local fire or police services would be expected. USPS would work closely with the City of Napa Fire and Police Departments as necessary throughout the site disposal; the future buyer would be expected to ensure that fire and life safety conditions are adequately maintained during any rehabilitation efforts as required by the protective covenant. The Proposed Action would require a new owner to maintain the building's historic character. Further, the Proposed Action would not result in adverse impacts to any schools in the vicinity of the USPS facility. The Proposed Action would not have any additional adverse impacts on other community services, including Postal mail operations; mail services for the Napa residents would continue unimpeded at the current, alternate facility.

Rehabilitation of Existing Station

No significant impacts on local fire or police services would be expected. USPS would work closely with the City of Napa Fire and Police Departments throughout project planning, construction, and operation of the facility rehabilitation to ensure that reliable emergency access in to and in the vicinity of the site is maintained and to inform them of construction schedules and any potential road delays. In addition, USPS and the site developer would coordinate with the fire department to ensure that adequate water supply and pressure for firefighting are available during rehabilitation efforts. The *Earthquake Damage Report* (ATI, 2015) did identify several fire and life concerns with the existing structure, including recommendations for upgrading exit door hardware and security devices, and installing a monitored fire alarm system and emergency lighting. USPS would work with the City departments to comply with all applicable codes accordingly if these recommended measures are implemented.

This alternative would not result in any adverse impacts on any schools or other community services, including Postal mail operations, in the vicinity of the USPS facility; mail services for Napa residents would continue unimpeded at the current, alternate facility until the Station is rehabilitated and reopened.

Demolition with New On-site Station

Impacts under this alternative would be similar to those under the rehabilitation alternative. Additional assistance from and coordination with the City Fire and Police Departments could be necessary due to the increased level of construction activities. All applicable building and fire and life safety codes would be met during construction of the new on-site facility. Further, this alternative would not have any additional adverse impacts on other community services, including Postal mail operations; mail services for the Napa residents would continue unimpeded at the current, alternate facility until the newly constructed Station is opened.

Demolition with New Off-site Station

Demolition impacts under this alternative would be similar to those under the demolition with on-site alternative. Fewer fire and police services in the immediate vicinity of the existing site would be needed following demolition activities; however, while future use of the vacated site cannot be determined, ultimate site use would likely reinstate the need for those services. Further, this alternative would not have any additional adverse impacts on other community services, including Postal mail operations. Mail services for the Napa residents would continue unimpeded at the current, alternate facility until a long-term new off-Site Station is opened within the same service area. Finally, the new off-site Station, likely lease of an existing building space would be within City land use and zoning requirements, presumably commercial/public use, and would therefore not impact available community resources.

No Action

The No Action alternative would have no impact to area community services specific to the mail as mail operations continue unimpeded at the current, alternate facility. However, long-term negative community services impacts could ensue with further Station deterioration (e.g., police support to prevent vagrancy or vandalism; enhanced fire prevention due to vacant structure).

Mitigation Measures for Community Services

For all alternatives involving demolition and/or construction, close coordination with the City of Napa Fire and Police Departments would reduce the potential for significant impacts on city services and any subsequent mitigation.

No Action

There are no mitigation measures possible for the No Action alternative. Long-term negative community services impacts could ensue with further Station deterioration (e.g., police support to prevent vagrancy or vandalism; enhanced fire prevention due to vacant structure). This supports the Proposed Action.

Utilities and Infrastructure

Utilities and utility infrastructure at and in the vicinity of the Napa-Franklin Station includes electric, water, wastewater, natural gas, and telecommunications. Pacific Gas and Electric Company (PG&E) is the power supplier for the USPS facility and surrounding area. The facility is served by above- and below-ground power lines; the facility is primary metered, meaning the main feeds from the PG&E switch-gear are owned and maintained by USPS. Natural gas service is also provided by PG&E. The City of Napa provides the facility's water supply. Sanitary wastewater is discharged to the City of Napa sewer system, which connects to the Napa's Sanitation District's Soscol Water Recycling Facility (NSD, 2015).

Impacts to Utilities and Infrastructure

Proposed Action

The proposed disposal of the Napa-Franklin Station would not result in any significant impacts to utilities and infrastructure.

Rehabilitation of Existing Building

No adverse impacts to utility service companies would be expected as a result of the rehabilitated USPS facility. It is expected that utility services to the site would be adequate to continue at pre-earthquake levels without impact to the service providers or the local demand. Any existing utility lines on the site would be marked accordingly prior to any construction or rehabilitation as necessary to ensure they are not accidentally cut or damaged.

Demolition with New On-site Post Office

Impacts under this alternative would be similar to the rehabilitation alternative. A new USPS facility on the site would not be expected to significantly alter site utility demands from pre-earthquake operational levels. There would likely be a greater potential for impact to underground utility lines during demolition and construction activities, but clear marking of these utilities and coordination with utility providers and the City of Napa would minimize any potential impacts

Demolition with New Off-site Post Office

Impacts under this alternative would be similar to the demolition with on-site construction alternative. Utility demand in the vicinity of the site would decrease, but would be needed elsewhere at the currently undetermined location of the new USPS facility.

No Action

The no action alternative would have no impact to site or area utilities and infrastructure because no construction would take place.

Mitigation Measures for Utilities and Infrastructure

Proposed Action

No mitigation measures would be necessary under the Proposed Action.

Other Alternatives

No mitigation measures would be necessary under any of the alternatives.

No Action

No mitigation measures would be necessary for the no action alternative because no impacts would occur.

Energy Conservation Requirements

Section 163 of the Energy Policy Act of 1992 directs USPS to establish a reliable system for tracking energy costs in its facilities and to identify and procure energy efficiency products. Section 164 directs USPS to survey its facilities for potential energy savings, make recommendations on needed improvements, and determine barriers. Section 165 requires USPS to report annually on its energy management activities.

Impacts to Energy and Conservation Requirements

Proposed Action

The Proposed Action would not result in significant adverse impacts on energy resources as the disposal would not result in a net increase or decrease in USPS operations in the Napa area.

Rehabilitation of Existing Building

This alternative would not result in significant impacts on energy resources. The USPS would comply with all applicable Executive Orders, legislation, and USPS policy regarding energy conservation, usage, and building design of the Franklin Station rehabilitation. The rehabilitation would likely be more energy efficient due to the incorporation of more energy efficient design elements. Typical energy conservation items include energy-efficient HVAC system, components, and controllers, efficient motors for equipment, and energy-efficient lighting and lighting design throughout.

Demolition with New On-site Post Office

Impacts would be similar to the rehabilitation alternative. The alternative would not result in significant adverse impacts on energy resources. The design of the new facility would follow USPS energy conservation standards and conservation/sustainability standards and policies.

Demolition with New Off-site Post Office

Impacts under this alternative would be similar to those under the demolition and on-site alternative. Appropriate energy efficiency standards would be applied to any off-site facility as well.

No Action

The no action alternative would have no impact to site or area energy and conservation because no construction would take place.

Mitigation Measures for Energy and Conservation Requirements

Proposed Action

No mitigation measures would be necessary under the Proposed Action.

Other Alternatives

No mitigation measures would be necessary under any of the other alternatives.

No Action

No mitigation measures would be necessary under the no action alternative.

Cumulative Impacts

Cumulative impacts result from incremental impacts of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time.

In summary, neither the Proposed Action nor any of the other alternatives would result in significant adverse cumulative impacts on the physical or cultural environment. While further development or redevelopment in the downtown Napa area can be expected in the future, discussions with the City's Planning Department indicate that no large projects or other development in the vicinity of the Napa-Franklin Station are currently planned or underway (Theriault, 2015 personal communication). Therefore implementation of any of the alternatives is not expected to significantly contribute to any impacts resulting from the overall development in the project area.

The Proposed Action and rehabilitation alternative would both ensure that the City's goal to "preserve and maintain sites, buildings, and landscapes that serve as significant, visible reminders of the City's social, architectural and agricultural history" is furthered and the historic resource is protected. The demolition alternatives would, however, contribute to an overall loss of historic properties within Napa. Any other potential cumulative impacts would be minimized by complying with applicable regulations and policies, using best management practices (BMPs) throughout construction and operation, and continuing to consult with local, state, and federal agencies as appropriate. No additional mitigation measures other than those discussed previously in this document would be necessary.

Public Participation

On August 20, 2015, a Notice of Intent to Prepare an Environmental Assessment was published in the *Napa Valley Register*, mailed to local public officials and interested organizations [distribution list in Appendix C], and posted publicly at a post office located at 820 Randolph Street, Napa, California. From that date until release of the Draft Environmental Assessment, a total of three written comments were submitted to USPS. All comments received were considered in preparation of this Draft Environmental Assessment. A copy of the comments received are included in Appendix B. In addition, a seven-day comment period is being provided from the day of publication of this Draft Environmental Assessment, giving the public an additional opportunity to comment on the document and USPS's Proposed Action and alternatives.

Finally, USPS notes that the Proposed Action was chosen in response to comments received during its initial Section 106 process, where a strong desire for the preservation of the historic attributes of the Napa Post Office was expressed.

Summary and Conclusions

USPS's Proposed Action analyzed in this Environmental Assessment involves disposing of (selling) the 13,020-square-foot Napa-Franklin Station structure and 0.66-acre property and offering it for sale in its current condition to an as-yet undetermined buyer. As part of the sale, USPS will impose a preservation covenant upon the property and building at the closing of the sale in order to comply with historic preservation components of the Section 106 regulations at 36 CFR 800.5(a)(2)(vii), which USPS complies with voluntarily, and avoid potentially creating an adverse effect on this historic property. Specifically, including such a covenant as part of the sale will ensure that the "transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance" is avoided and the historic Napa-Franklin Station is protected for future use.

The Environmental Assessment also assesses the impacts of implementing alternatives that would involve rehabilitating the existing Napa-Franklin Station and reestablishing USPS operations at that facility; an alternative that would involve demolishing the Napa-Franklin Station building and establishing a new USPS facility on the existing site; an alternative that would involve demolishing the existing Napa-Franklin Station building and constructing a new USPS facility on another site somewhere in Napa; and a no action alternative that would involve retaining the Napa-Franklin Station in its current condition and retaining USPS ownership and management of the building and grounds without resuming USPS operations at the site.

The Environmental Assessment concludes that the Proposed Action would not result in significant adverse impacts on the physical or cultural environment. The Proposed Action would have a long-term beneficial impact on USPS operations by providing the most cost-effective alternative for USPS and its customers while preserving the historic character and nature of the Napa-Franklin Station. As the sale would include the preservation covenant, the disposal of the

property under the Proposed Action would not have an adverse effect on any historic properties. Other alternatives considered, including USPS's rehabilitation of the existing building, demolition of the building and reconstruction of a new facility on the existing site, or demolition and establishment of a new facility on another site through a lease agreement, would be cost prohibitive and would not further enhance USPS operations. Demolition and acquisition and construction of a new off-site facility is an uncommon practice for the USPS and not considered a viable alternative. Furthermore, leaving the facility in its current condition without occupancy and restoration would likely lead to further decline of the structure and result in adverse safety, aesthetic, economic and historic impacts.

Impacts and mitigation measures associated with the Proposed Action and other alternatives, including the No Action alternative, for each element in the environment analyzed in this Environmental Assessment are summarized in Table 1.

In summary, the Proposed Action would result in both the fewest overall environmental impacts and least costs of all the alternatives, including the no action alternative. It is USPS's best approach to addressing the future of the Napa-Franklin Station.

Table 1. Summary of Impacts and Mitigation Measures

Element/Resource	Proposed Action	Rehabilitation of Existing Building	Demolition with New On-site Post Office	Demolition with New Off-site Post Office	No Action
Topography, Geology, and Soils	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: Improvements to property would likely include excavation, shoring, and foundation support of existing building to bring it to seismic standards. Mitigation: USPS would implement measures that would address seismic impacts to the existing site by restoring the building to its pre-earthquake condition and reinforcing the existing structural system to improve seismic performance.	Impacts: Clearing and grading of land and construction of new building, associated parking, loading docks, and driveways. Mitigation: USPS would implement measures that would address seismic impacts to the existing site by constructing a new building improving seismic performance.	Impacts: Clearing and grading of land and construction of new building, associated parking, loading docks, and driveways. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Hydrology and Water Quality	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Floodplains	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: It is possible, but not likely, that the new site could be located within a 100-year or 500-year floodplain in order to accommodate the new facility. In this case, USPS would carefully consider location of floodplains prior to any occupancy and would follow required regulatory and policy requirements. As mentioned, the new site would likely be a lease of existing space. Mitigation: No mitigation necessary. USPS would carefully consider location of floodplains prior to any occupancy and would follow required regulatory and policy requirements. Such measures, applicable policy-wise to the 100-year floodplain, commonly include ensuring adequate structure elevation to prevent flood impacts, avoidance of any hazardous materials storage in a flood-prone area, and examination of the entire new site preferred area to ensure only the 100-year floodplain alternative is viable.	Impacts: None. Mitigation: No mitigation necessary.
Wetlands	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Prime Farmland	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.

Table 1. Summary of Impacts and Mitigation Measures

Element/Resource	Proposed Action	Rehabilitation of Existing Building	Demolition with New On-site Post Office	Demolition with New Off-site Post Office	No Action
Vegetation	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary. USPS or site owner would follow City of Napa landscaping/revgetation plans and a County-approved soil and erosion control plan to help protect vegetation.	Impacts: No significant impacts. Mitigation: No mitigation necessary. USPS or site owner would follow City of Napa landscaping/revgetation plans and a County-approved soil and erosion control plan to help protect vegetation.	Impacts: No significant impacts. Mitigation: No mitigation necessary. USPS or site owner would follow City of Napa landscaping/revgetation plans and a County-approved soil and erosion control plan to help protect vegetation.	Impacts: None. Mitigation: No mitigation necessary.
Fish and Wildlife	Impacts: No significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site. Mitigation: No mitigation necessary.	Impacts: No significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site. Mitigation: USPS and its developer would work with the city and county to restore or replant any lost vegetation to the extent practicable given future site plans. .	Impacts: No significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site. Mitigation: USPS and its developer would work with the city and county to restore or replant any lost vegetation to the extent practicable given future site plans. .	Impacts: No significant impacts to threatened, endangered, or migratory species resources due to their unlikely presence on site. Mitigation: USPS and its developer would work with the city and county to restore or replant any lost vegetation to the extent practicable given future site plans. .	Impacts: None. Mitigation: No mitigation necessary.
Air Quality	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: Minimal fugitive dust emissions during construction activities. However, would not interfere with maintenance of ambient air quality standards. Mitigation: No mitigation necessary.	Impacts: Minimal fugitive dust emissions during demolition and construction activities. However, would not interfere with maintenance of ambient air quality standards. Mitigation: No mitigation necessary.	Impacts: Minimal fugitive dust emissions during demolition activities. However, would not interfere with maintenance of ambient air quality standards. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Historical and Archaeological Resources	Impacts: As the Proposed Action would include a preservation covenant, no adverse impacts on the historic structure would be expected. There are no known archaeological sites within the APE; however, should additional construction occur that involves ground disturbance in previously undisturbed areas, archaeology may need to be addressed. The Proposed Action would also have minimal or no impact on the historic properties in the vicinity at 1332-1364 Third Street (Uptown Theater) and 833 Franklin Street (Robert Sterling House) as no significant changes to the Napa Franklin Station or its setting would occur from the property transfer. Any changes to the building would be governed by the proposed preservation covenant. Mitigation: No additional mitigation measures would be necessary as any work performed by the new site owner would be conducted according to the preservation covenant and the <i>Secretary of the Interior's Standards and Guidelines Properties</i> .	Impacts: Rehabilitation would follow the <i>Secretary of the Interior's Standards and Guidelines Properties</i> , as interpreted and amended by the California SHPO and would result in no adverse impacts. Mitigation: No additional mitigation measures would be necessary as the work would be conducted according to the <i>Secretary of the Interior's Standards and Guidelines Properties</i> .	Impacts: Demolition of the existing building would result in significant impact since it would alter the physical character of the historic property and demolition is considered adverse and irretrievable. Mitigation: No additional mitigation measures would be necessary as the work would be conducted according to the <i>Secretary of the Interior's Standards and Guidelines Properties</i> .	Impacts: Demolition of the existing building would result in significant impact since it would alter the physical character of the historic property and demolition is considered adverse and irretrievable. Mitigation: No additional mitigation measures would be necessary as the work would be conducted according to the <i>Secretary of the Interior's Standards and Guidelines Properties</i> .	Impacts: Impacts would occur through the continued deterioration of an historic building. Mitigation: Mitigation to prevent further deterioration of the historic building would be necessary. USPS would work with the City of Napa, California Office of Historic Preservation, and other stakeholders to develop appropriate mitigation measures.

Table 1. Summary of Impacts and Mitigation Measures

Element/Resource	Proposed Action	Rehabilitation of Existing Building	Demolition with New On-site Post Office	Demolition with New Off-site Post Office	No Action
Local Employment and Economics/Relocation	<p>Impacts: No significant impacts. Once sold, the Proposed Action would have no impact on local employment and economics because the temporary facilities would remain open and no local jobs would be lost.</p> <p>Mitigation: No mitigation measures would be necessary.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary. There may be temporary additional demolition and construction contractor local employment, but for long-term operations, Postal staff resources and general services are likely to stay similar to the past scenario.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary. There may be temporary additional demolition and construction contractor local employment, but for long-term operations, Postal staff resources and general services are likely to stay similar to the past scenario.</p>	<p>Impacts: No significant impacts. While it is too speculative at this stage to determine the use of the vacant site post-demolition, the use would be anticipated to be aligned with surrounding commercial use, thus likely adding to future local employment opportunities.</p> <p>Mitigation: No mitigation necessary. There may be temporary additional demolition and construction contractor local employment, but for long-term operations, Postal staff resources and general services are likely to stay similar to the past scenario.</p>	<p>Impacts: None.</p> <p>Mitigation: No mitigation necessary.</p>
Environmental Justice	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: None.</p> <p>Mitigation: No mitigation necessary.</p>
Land Use and Zoning	<p>Impacts: No significant impacts. The Proposed Action would be compatible and consistent with the existing land use on the site and in the general vicinity of the project. The Napa-Franklin Station site is currently owned by the USPS. However, the future owner would need to comply with local land use and zoning regulations depending on the proposed use of the facility.</p> <p>Mitigation: No mitigation necessary provided land use and zoning is adhered to.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary provided land use and zoning is adhered to.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary provided land use and zoning is adhered to.</p>	<p>Impacts: No significant impacts.</p> <p>Mitigation: No mitigation necessary provided land use and zoning is adhered to.</p>	<p>Impacts: Impacts would occur through the continued deterioration of the structure and grounds. It is also likely that leaving the existing facility in its current condition would be in violation of City of Napa building and land use codes, and fire and safety codes and regulations.</p> <p>Mitigation: Mitigation to prevent further deterioration of the building would be necessary. USPS would work with the City of Napa and other stakeholders to develop appropriate mitigation measures.</p>
Visual Resources/Aesthetics	<p>Impacts: No significant impacts. The buyer of the property would be responsible for adhering to the conditions of the protective covenant, which would ensure that significant historic features of the facility are preserved, rehabilitated and/or restored in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. It is also presumed that the future buyer will ensure landscaping in accordance with City of Napa regulations.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: No significant impacts. Rehabilitation of the new Station could slightly alter the aesthetics of the site, but the appearance of the rehabilitated facility would be expected to remain generally the same and improve over the current views of the damaged structure.</p> <p>Mitigation: No mitigation necessary.</p>	<p>Impacts: Demolition of the existing Post Office and construction of the new facility on the site would alter the aesthetics of the site and immediate site vicinity.</p> <p>Mitigation: USPS would work with the City to comply with applicable development standards and other landscaping measures to the extent practicable.</p>	<p>Impacts: Demolition of the existing Post Office and construction of the new off-site facility on the site would alter the aesthetics of the site and immediate site vicinity.</p> <p>Mitigation: USPS would work with the City to comply with applicable development standards and other landscaping measures to the extent practicable.</p>	<p>Impacts: Continued deterioration of the facility could be expected, resulting in adverse aesthetic and visual impacts on the site and in the immediate vicinity.</p> <p>Mitigation to prevent further deterioration of the building would be necessary. USPS would need to work with the City of Napa and other stakeholders to develop appropriate mitigation measures.</p>

Table 1. Summary of Impacts and Mitigation Measures

Element/Resource	Proposed Action	Rehabilitation of Existing Building	Demolition with New On-site Post Office	Demolition with New Off-site Post Office	No Action
Noise	Impacts: No significant impacts. Although the ultimate use of the facility would remain uncertain, the use would presumably remain consistent with other development in the area and in compliance with established City noise regulations. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Hazardous Materials and Waste	Impacts: No significant impacts. Hazardous materials used or stored would need to be removed or continue to be managed in accordance with applicable regulations and USPS policy. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Hazardous materials used or stored would need to be removed or continue to be managed in accordance with applicable regulations and USPS policy. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Hazardous materials used or stored would need to be removed or continue to be managed in accordance with applicable regulations and USPS policy. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Hazardous materials used or stored would need to be removed or continue to be managed in accordance with applicable regulations and USPS policy. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Hazardous materials used or stored would need to be removed or continue to be managed in accordance with applicable regulations and USPS policy. Mitigation: No mitigation necessary.
Transportation	Impacts: No significant impacts. The future use plans would be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings. Construction work will be focused mainly on the building, will be short-term, and in compliance with City traffic requirements, so construction impacts are not anticipated. Mitigation: Minimal mitigation necessary by compliance with City of Napa transportation-related regulations.	Impacts: No significant impacts. The future use plans would be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings. Construction work will be focused mainly on the building, will be short-term, and in compliance with City traffic requirements, so construction impacts are not anticipated. Mitigation: Minimal mitigation necessary by compliance with City of Napa transportation-related regulations	Impacts: No significant impacts. The future use plans would be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings. Construction work will be focused mainly on the building, will be short-term, and in compliance with City traffic requirements, so construction impacts are not anticipated. Mitigation: Minimal mitigation necessary by compliance with City of Napa transportation-related regulations	Impacts: No significant impacts. The future use plans would be aligned with City land use and zoning requirements, which would allow for uses with acceptable transportation impacts given the surroundings. Construction work will be focused mainly on the building, will be short-term, and in compliance with City traffic requirements, so construction impacts are not anticipated. Mitigation: Minimal mitigation necessary by compliance with City of Napa transportation-related regulations	Impacts: None. Mitigation: No mitigation necessary.
Parks and Recreation	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.
Community Services	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: Close coordination with the City of Napa Fire and Police Departments would reduce the potential for significant impacts on city services and any subsequent mitigation.	Impacts: No significant impacts. Mitigation: Close coordination with the City of Napa Fire and Police Departments would reduce the potential for significant impacts on city services and any subsequent mitigation.	Impacts: No significant impacts. Mitigation: Close coordination with the City of Napa Fire and Police Departments would reduce the potential for significant impacts on city services and any subsequent mitigation.	Impacts: Possible impacts from additional fire and police response. Mitigation: No mitigation necessary.
Utilities and Infrastructure	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.

Table 1. Summary of Impacts and Mitigation Measures

Element/Resource	Proposed Action	Rehabilitation of Existing Building	Demolition with New On-site Post Office	Demolition with New Off-site Post Office	No Action
Energy Conservation Requirements	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: No significant impacts. Mitigation: No mitigation necessary.	Impacts: None Mitigation: No mitigation necessary.
Cumulative Impacts	Impacts: No significant cumulative impacts are expected. The Proposed Action would ensure that the City of Napa's goal to "preserve and maintain sites, buildings, and landscapes that serve as significant, visible reminders of the City's social, architectural and agricultural history" is furthered. Mitigation. No mitigation necessary.	Impacts: No significant cumulative impacts expected. Mitigation: No mitigation necessary.	Impacts: No significant cumulative impacts expected. Mitigation: No mitigation necessary.	Impacts: No significant cumulative impacts expected. Mitigation: No mitigation necessary.	Impacts: None. Mitigation: No mitigation necessary.