

Additional Public Comments received after Agenda Publication

From: soffad@sbcglobal.net
To: Hawkes, Trevor

Subject: "Draft Housing Element Update," **Date:** Tuesday, July 5, 2022 10:21:55 AM

[External Email - Use Caution]

Dear Trevor I would like to record my opposition to the proposed housing project. I own units 481 and 482 at 1600 Atlas Peak road. My basic concern is one of fire safety. The roads surrounding the project are two lane and already often near capacity. Adding a hundred new homes and perhaps 150 cars to be evacuated basically across the street from a resort full of guests is irresponsible. These roads are dangerous, with no traffic controls and limited sight lines. Also the aesthetics of the current area are really quite bucolic which is why so many flock to the Silverado resort and the surrounding areas. The increased housing density will bring increased commercial activity around Monticello road and atlas peak changing the nature and perhaps the desirability of the region for tourists. I understand there may also be flood plain issues. All and all increased housing in this region is a very bad idea that I sincerely hope will be rejected

David J Soffa MD,MPA, FACR soffad@sbcglobal.net www.linkedin.com/in/djssoffa 415-722-5328

From: Chris Malan

To: <u>Hawkes, Trevor</u>; <u>PlanningCommissionClerk</u>

Subject: Napa County Housing Element Update 2022 CEQA scoping and or NOP ICARE comments

Date:Tuesday, July 5, 2022 5:23:25 PMAttachments:ICARE comments HEU .pdf

[External Email - Use Caution]

Hello Napa County Planning Department,

Here are the Institute for Conservation Advocacy, Research and Education's comments regarding this item for tomorrow's Planning Commission public hearing.

I would like this distributed to the public.

In Collective Protection of Mother Earth, So All May Live,

Chris Malan

Executive Director Institute for Conservation Advocacy, Research and Education 707.322.8677



INSTITUTE FOR CONSERVATION ADVOCACY RESEARCH AND EDUCATION

ICARE
PO BOX 4256
NAPA, CA. 94558
cmalan1earth@gmail.com
icarenapa.org
707.322.8677

July 5, 2022

The Institute for Conservation Advocacy Research & Education, (ICARE) established in 2004, is a non profit community-based organization located in Napa County, California. ICARE's mission is to restore and conserve the biological integrity and ecosystems health of watersheds, the Napa River estuary and the greater San Francisco Bay Area through science-based advocacy, research and education.

Napa County Planning and Environmental Health Department Napa County Planning Commission 1195 3rd Street, Suit 210 Napa, Ca. 94559

Chris Malan
Executive Director
Institute for Conservation Advocacy Research and Education
Permission to read into the record: Parry Murray

Re: Napa County General Plan Housing Element Update-Public Hearing comments for the preparation of California Environmental Quality Act/CEQA for this housing update

Dear Planning Commission,

The Institute for Conservation, Advocacy, Research and Education offers these comments about the 6 sites the County has chosen out of 230 parcels that could fit the County needs to comply with the Regional Housing Needs Allocation/RHNA of the Bay Area for lower income housing.

Site #1: Spanish Flat

This area has had wastewater treatment issues such that Lake Berryessa has been polluted by failed wastewater treatment infrastructure for many years. Lake Berryessa has had harmful algae blooms for years now requiring public advisories for people to stay out of the water. Harmful algae blooms can cause mortality to humans and pets.

Will the current wastewater treatment plant be able to handle 100-125 new households?

This is identified as medium fire threat area. This area has seen severe fires since 2017 causing area wide evacuations of people onto small country roads.

Additionally, ICARE notes that there is little to no transportation to services such as: Medical, dental, groceries, schools. This site is too isolated for this population of people who need easy access to care and services.

Site #2-Bishop:

This site is a wrong location for 100-125 low income housing for these significant environment reasons:

- This land fits the description of prime agricultural lands as determined by State Lands and should be protected as such even though the current zoning is Residential Country District/AW. The current use has been used for farming/grazing for decades and is the best use of this land and soil. To convert these soils to concrete is a tragic waste of this high value natural resource, soil, natural resource in drastic decline Statewide.
- Agricultural Watershed/AW is not allowed to be rezoned to meet RHNA housing demands.
- The Intergovernmental Panel on Climate Change recommends preserving natural lands to mitigate the environmental impacts of climate change. Napa County must recognize that agricultural lands must be protected for raising crops that can serve to feed people during climate disasters where food shortages and supply chains can cause harm to human survival and quality of life.
- Steelhead trout migrate, spawn and live for 2 years in Milliken Creek running through this property. This specie is vulnerable to pollution and human interference with their habitat. A healthy riparian buffer must be maintained to keep the fish in good condition.
- No increased rate of stormwater runoff can enter Milliken Creek via a culvert due to habitat destruction caused by erosion of the bed and banks of Milliken Creek at point of stormwater discharge to the creek.
- This increased rate stormwater runoff, (caused by 100-125 housing units) will scour the steelhead eggs and destroy these egg nest/redds.
- This property is in the flood area of Milliken Creek. Putting in 100-125 units of concrete right on the creek will cause all the homes on Hedgeside to flood due to increased rate of stormwater runoff. The soils will no long infiltrate stormwater and instead all this stormwater will run directly into Milliken Creek. In the last large storms since 2017, Milliken Creek has been at the top of the bridge going over the creek on Hedgeside Road.
- The Milliken Sarco Tulocay/MST groundwater aquifer, (where this parcel overlays), is in severe groundwater depletion. Covering up this parcel with concrete will deprive the MST of critical groundwater recharge.

Site #3- Altamura:

Same comments about the MST groundwater aguifer as for Site #2.

Site #4: Big Ranch Rd.

- This site includes Agricultural Watershed zoning therefore RHNA housing needs is not allowed here.
- Steelhead and Chinook salmon use Salvador Creek to migrate spawn and rear. The Salvador Creek is on and near this site. Pollution and increased rate of stormwater runoff will harm these endangered and threatened species.

Site #5-Imola

- Same comments about the MST groundwater comments here as well.
- Marie Creek has steelhead trout. This project will harm migration, spawning and rearing habitat. Same comments as Bishop site regarding the specie harm due to increased rate of stormwater runoff.
- Riparian protection is necessary.

Site #6-Foster Rd.

- Sacramental splittail is a protected specie and is known to be in this location. Therefore, the streams and wetlands need protection from housing pollution and increased rate of stormwater runoff to the stream which could damage this species habitat.
- The current zoning includes Agricultural Watershed, therefore, RHNA housing demands can not be used here.

For all these sites the DEIR must clearly state the GHG emissions and how they will be mitigated.

From: Kelly Meadows
To: Hawkes, Trevor

Subject: Concerns - Bishop Site on Hedgeside Avenue

Date: Tuesday, July 5, 2022 5:01:26 PM

[External Email - Use Caution]

July 6, 2022

Mr. Hawkes,

I am writing because I have serious concerns about the proposed 125 unit housing development on Hedgeside Avenue at the "Bishop" site.

My stepdad lives on McKinley Road, near the corner of Hedgeside Avenue and McKinley Road. My children play on McKinley Road. Our family walks McKinley Road, as do so many other Napa residents.

In alignment with some of the city of Napa's priorities (safety, city resources, and agricultural balance), please reevaluate the 'Bishop' site on Hedgeside Avenue.

Pedestrian Safety - This development impacts the safety of this walking-friendly neighborhood. Traffic would increase with the 125 units proposed, and yet there are no sidewalks. Because the safety of Napa residents is a priority, sidewalks along both Hedgeside Avenue and McKinely Road are a must if this project moves forward.

Traffic Light - In addition, there is no left turn lane off Monticello Road onto Hedgeside Avenue. A traffic light would be needed to not impact the traffic on Monticello Road, one of the main arteries of Napa.

Water Impact - Finally, as noted in the environmental study, the water table and creeks would be impacted. I know Napa prioritizes water resources and agricultural balance. Milliken Creek is a site for several species' reproduction (including the Steelhead, Coho Salmon, Chinook Salmon, all of which are decreasing in populous). Ultra-high density housing developments do not belong adjacent to such a sensitive and important biological resource.

Please consider removing the Bishop property on Hedgeside Avenue from the list of possible sites.

Thank you for your time,

Kelly Meadows

From: Charles S.

To: Hawkes, Trevor
Cc: Charles Swain

Subject: Draft Housing Element Update - Opposition to Silverado neighborhood sites

Date: Tuesday, July 5, 2022 1:32:15 PM

[External Email - Use Caution]

To the Board of Supervisors,

I wish to express my opposition to further increasing the housing density in the Silverado neighborhood (Altamura site and Bishop site).

The Silverado neighborhood development growth has been purposefully constrained for many years to promote a semi-rural neighborhood that is in balance with local agriculture and wildlife. In fact, high density housing is incompatible with long established zoning ordinances under the Agricultural Preserve. Consequently, building significant new housing units, especially high density housing structures, risks destroying the quality of our Silverado ecosystem.

I kindly ask that you consider other undeveloped sites for the construction of new housing units.

Thank you,

Charles Swain 160 Canyon Place Napa, CA 94558 From: <u>ere:</u>

To: Hawkes, Trevor

Subject: DRAFT HOUSING ELEMENT UPDATE

Date: Tuesday, July 5, 2022 2:17:57 PM

[External Email - Use Caution]

FROM: ROB and CAROL HEYWOOD 210 WINTERGREEN CIRCLE NAPA, CA 94558

I would like to place on record our opposition to the Draft House Element Update and the plans to build more houses in the Silverado area, which is currently being discussed by the county.

- 1: Our local two-lane roads carry more than enough traffic as it is along Monticello Road. With more than 100 new homes in a small area is estimated to produce more than 1000 car trips per day. This will cause chaos at the three-way Trancas-Monticello-Silverado Trail intersection on a daily basis.
- 2: Turn off to Hedgeside via Monticello Road or Hardman are dangerous as it is, with no traffic controls or turn off lanes, limited sight lines entailing a sharp turn off a two-lane road.
- 3. With the fire dangers that we are all going to be facing in the future, it seems irresponsible to add extra housing when we have a limited number of access roads for evacuation purposes. This will only exacerbate the problem during the long fire season we are facing.
- 4.: Lack of sewer capacity is another problem. Hedgeside site is situated on a flood plain where substantial new construction is inadvisable.
- 5: High density house is incompatible with more than 50 years of zoning under the Agricultural Preserve.
- 6: And finally, this project is simply pushed on residents with no showing of demand, at a time of little or no growth in Napa.

We sincerely hope that common sense will prevail and will ensure this project will never take place.

Signed: Carol Heywood.

From: <u>Jacqueline Williams</u>
To: <u>Hawkes, Trevor</u>

Subject: Draft housing element update
Date: Tuesday, July 5, 2022 5:16:03 PM

[External Email - Use Caution]

Mr. Hawkes,

I'm writing to you to express my concerns about the potential Bishop and Altamura developments. I have lived on Silver Trail for 16 years. My concerns are as follows:

- 1. Atlas Peak road currently has too much traffic. It is difficult to pull out of silver trail safely due to the speeding traffic headed for Hardman Ave and Silverado Trail. Not to mention the speeding Traffic headed up Atlas Peak. Multiple events at the Silverado Resort already make the roads difficult to navigate safely.
- 2. During the evening of October 8, 2017, I had to evacuate my elderly mother on Kannapali Drive and evacuate my own home on Silver Trail. Driving back and forth between the two streets, while the entire area was evacuating during the fire, was almost impossible due to the sheer number of cars on atlas Peak and Hillcrest. My daughter and I left our animals to get my wheelchair bound mother first and then tried to return back to our house to get the animals and then leave the area. The traffic congestion that night was terrifying. Adding even a few more residents with vehicles to this area would put us in even more danger during disaster evacuations. The roads simple can not accommodate the current residents in emergency evacuations as it is.
- 3. We have a significant amount of bicycle traffic on Atlas Peak road. During the school year, parents and children on bikes go to and from Vichy elementary school.

We also have a significant number of tourists from Silverado resort on bicycles on Atlas Peak road. These bicyclists are distracted and often don't know where they are going, seemingly unaware of the dangers of riding a bike on busy Atlas Peak. Again, more residents with more cars will put the bicyclist on Atlas Peak Road in more danger than currently exists.

- 4. The automobile traffic on Atlas Peak is already bad for wildlife and domestic animals. Dead animals are frequently seen on the side of the road. More cars will increase the roadkill in the area.
- 5. Lastly, the exhaust fumes from Atlas Peak are a problem for Silver Trail. Cars, service vehicles, winery trucks all contribute to the exhaust fumes in our area. I have learned to keep my south and west facing windows closed to cut down on the exhaust fumes entering my house.

We on silver Trail do not want more exhaust fumes in our neighborhood.

Either one of the Bishop or Altamura developments would increase our exposure to toxic vehicle fumes and have negative effects on our families.

I hope you will share my concerns with your colleagues. Thank you for your time and consideration.

Jacqueline Williams, Ph.D. 1518 Silver Trail Napa. 94558

Sent from my iPhone

From: Morrison, David

To: <u>Hawkes, Trevor</u>; <u>Hall, Jason</u>

Subject: FW: Please don"t use Skyline Park for housing

Date: Tuesday, July 5, 2022 10:02:21 AM

From: Jill Silverman Hough < jill@jillhough.com>

Sent: Saturday, July 2, 2022 2:52 PM

To: Morrison, David <David.Morrison@countyofnapa.org>; joellgPC@gmail.com; Whitmer, David <Dave.Whitmer@countyofnapa.org>; anne.cottrell@lucene.com; andrewmazotti@gmail.com;

megan.ameron@countyofnapa.org

Cc: napadavid@sbcglobal.net

Subject: Please don't use Skyline Park for housing

[External Email - Use Caution]

Dear Planning Commission,

I'm writing to respectfully register my objection to using Skyline Wilderness Park for housing.

Skyline Wilderness Park is just that—a park. It already has a use—it's not surplus. And it's not just a park, it's a singularly unique park, one that's beneficial to the whole community in that it uniquely offers hiking, biking, equestrian activities, archery, and so much more in a uniquely natural and wild setting. That combination of communities that the park brings together, along with its very natural and wild quality, make it something to be protected and treasured.

Skyline Park is also uniquely large—that's one of the things that makes it feel so far away even though it's not. But taking away any piece of it threatens the health and livelihood of the rest of the pieces. In other words, the activities that take place on the portion that's being considered for housing help fund activities in the other areas. Without the unique combination of them all, the park's ability to function would be threatened.

Skyline Park is a jewel in the Napa Valley and the greater Bay Area. I understand that housing is important, but please don't use an area that's already so useful and beneficial to so many for this purpose.

Thank you for your consideration, and your work,

Sill

Jill Silverman Hough

cell 707.255.6550

web www.jillhough.com

email jill@jillhough.com

kitchen wisdom www.jillhough.com/blog

facebook Jill Silverman Hough

twitter @JillSHough

pinterest @JillSHough

instagram @JillSHough

linkedin @JillSHough

my books on Amazon

From: Morrison, David

To: Hawkes, Trevor; Hall, Jason

Subject: FW: Save Skyline Wilderness Park

Date: Tuesday, July 5, 2022 11:45:03 AM

From: Teresa Vandal <teresavandal@yahoo.com>

Sent: Tuesday, July 5, 2022 11:43 AM

To: Teresa Vandal at Yahoo <teresavandal@yahoo.com>

Subject: Save Skyline Wilderness Park

[External Email - Use Caution]

From: Teresa Vandal, 2473 Carriage Place, Napa, California 94558 ~ (707) 486-3079

To: City of Napa, County of Napa and State of California Representatives

Re: Skyline Wilderness Park

Dear Representatives:

I am writing in support of Skyline Wilderness Park and in *strong opposition* to any part of the park being converted to urban development.

It is recognized that there is a need for affordable housing in our county, but there are other areas that would serve this need without taking from the park.

The park is serving a critical need for the community and visitors from all walks of life as an environmental resource, outdoor recreation space, 20 miles of trails, a native plants garden, archery range, two disc golf courses, tent and RV camping, an equestrian camping area, arena, round pen and obstacle course.

In addition, the park provides ample space for picnicking and family gatherings, and most importantly, has the capacity to host large community events such as running races, Search and Rescue trainings, tribal gatherings/pow wows, equestrian events with large trailer parking and other gatherings with participants numbering in the hundreds or even more.

I urge you to do everything in your power to protect and enhance this critical community resource.

Sincerely,

Teresa L. Vandal

From: RICHARD HARBISON

To: Hawkes, Trevor; Morrison, David; Tran, Minh; Pedroza, Alfredo; Cortez, Nelson; andrewmazotti@gmail.com;

Info@savehedgeside.com

Subject: No to "Bishop Site" Comments on 2022 Housing Element Plan

Date: Tuesday, July 5, 2022 10:17:44 AM

[External Email - Use Caution]

Trevor,

Please include my below comments for the 2022 Housing Element Update.

I'm opposed to re-zoning the "Bishop Site" because high density housing in a rural environment is a big mistake. There are no city or county services to support such a development (namely sewer), this type of development will destroy the historical culture of the area, the two lane roads that service this area are already congested with traffic avoiding the southern exits of the Napa Valley.

This is the wrong location for such a development - find a different location that has the infrastructure to support a development of this nature. The states requirement to build such high density properties in a County environment makes no sense - push back on the state requiring this ridiculous type of development which a merely attempt to expand city limits...or develop properties consistent with the historical use to meet the requirement.

Rich Harbison Napa, CA From: Pat Felde

To: Hawkes, Trevor; Morrison, David; Tran, Minh; Pedroza, Alfredo; Cortez, Nelson; andrewmazotti@qmail.com;

<u>Info@savehedgeside.com</u>

Cc: SaveHedgesideAvenue@gmail.com

Subject: No to "Bishop Site" Comments on 2022 Housing Element Plan

Date: Tuesday, July 5, 2022 11:06:51 AM

[External Email - Use Caution]

Trevor,

Please include my below comments for the 2022 Housing Element Update.

I'm opposed to re-zoning the "Bishop Site" because

Patrick Felde: 1771 McKinley Road

My property shares a property line in the middle of Milliken Creek, an environmentally sensitive watershed, with the Bishop Property. Development of this property is of great concern to me and our community. I'm sure you have seen many communications from our fellow neighbors expressing those very valid concerns.

We have one of the most unique "hidden" agricultural and residential areas in Napa Valley. Originally "developed" on Oct. 13th 1909 as the Map of Mount & Son's Subdivision of Hedgeside. McKinley Road was known as Yajome at that time. There were only 14 lots in the initial split. The entirety of this subdivision was part of a Spanish land grant to Gov. Vallejo and included many hundreds of acres including all of the land surrounding the The Silverado Country Club. Again, this is a very unique and historic area bound by 3 external roads, Monticello, Hardman, and Atlas Peak, 2 of which have dead ends. There are 3 internal roads Hedgeside, McKinley and Estee all of which have dead ends. Ingress and egress is, already, a concern for life and safety during emergency situations. Development of the Bishop Property will only complicate this already serious situation with a huge additional amount of daily traffic as well as all of the environmental and cultural changes that will affect this wonderful community forever.

Please reconsider your decision on the Bishop Property.

Thank you.

Patrick & Miranda Felde

From: <u>JC Greenberg</u>
To: <u>Hawkes, Trevor</u>

Cc: Morrison, David; Tran, Minh; Pedroza, Alfredo; Cortez, Nelson; andrewmazotti@gmail.com; Wagenknecht, Brad;

Gregory, Ryan; Dillon, Diane; Ramos, Belia; joellegpc@gmail.com; Whitmer, David; anne.cottrell@lucene.com;

Dameron, Megan; Lederer, Steven

Subject: Opposition to "Bishop Site" Comments on 2022 Housing Element Plan

Date: Tuesday, July 5, 2022 4:35:57 PM

[External Email - Use Caution]

Trevor,

Please include my below comments for the 2022 Housing Element Update.

July 5, 2022

To Whom it May Concern:

Hedgeside Avenue has formed an advocacy neighborhood group that is in opposition of rezoning the Bishop site for High-Density Housing. This group is composed of our nearby residents who share concerns of such type development that pose hazards to our current properties and that of potential new residents or tenants whom would occupy this High-Density Housing. I have attached a screen shot of our petition (as you advised) representing the numbers of signator's in opposition. The Chang.org petition was just created on July 2nd and represents 216 signatures to date of this email.

Our neighborhood just learned of this HEU 6th Cycle process on June 20, 2022, when the County of Napa mailed out letters (postmarked 6/16) to residents within 1,000 feet of a proposed site. Recently we've learned this HEAC process has been moving forward since Fall of 2021 and public outreach has been limited in nature. As public citizens, we have already missed public comment periods occurring back in February 25th, 2022. These timelines should bring awareness that the Draft HEU was published on June 10th, 2022 and comments close July 11th, 2022. This is a very short window for residents to educate themselves of this Draft HEU plan and digest the safety concerns the Bishop site presents.

Many residents have written letters expressing safety concerns and posed various questions about the impacts of the Bishop site. Below is a short list for documented review:

Traffic:

- Hedgeside Avenue is not built for 1,250+ additional car trips per day.
- The Blind "Killer" Curve adjacent to the proposed project site is currently dangerous, and poses a major danger when traffic volume increases with this project. Many cyclist, runners and recreationist use this road and this increased amount of traffic poses life risk, especially on "Killer" curve.
- Ingress and egress off Monticello Road (Hwy 121) onto Hedgeside is dangerous as

there is no left hand turn lane. Additional traffic will put left had turn vehicles in danger without improvements.

- Traffic exiting from Estee Ave onto Hardman inhibits vision of a blind hill and traffic speeds averaging 50mph.
- ***Blind driveways around "Killer" curve poses great danger for current residents exiting and entering onto Hedgeside.

Fires

- Hedgeside has been evacuated numerous times and for weeks on end since 2017. Napa's wildfire problem has drastically increased over the past 10 years and Napa planning projects for housing need to be appropriately placed to not put current and future residents at risk. Especially low-income residents that are dependent on public transportation for safety and evacuations.

Floods

- Milliken Creek floods over the bridge even on mild annual rain fall years. This makes our Hedgeside Ave impassible and residents are forced to use alternate routes. This flood event last occurred on February 7th, 2017. Subsequently, the same year the Atlas Complex required residents of Hedgeside to evacuate from wildland fires.
- The Bishop field is a flood plain that holds water and recharges aquifer's. If this site is approved, 5 acres of annual rain will need diverted elsewhere to accommodate the surface area once held and absorbed. This displacement of 5 acres of water will be sent downstream to Milliken, further complicating the flood issue. Additionally the Bishop field is located at a higher elevation than Hedgeside and this 5 acres of displaced water will flood homes located below grade of Hedgeside Ave. How will these issues be mitigated?

Food Desert

- Low income residents do not have access to affordable food sources or daily services within walking distances.
- Lack of school access and proximity (K-12 grades)
- Walk score requires private transportation and no public options available.

This is only a partial list of concerns and safety issues the Bishop site presents. We as a neighborhood group are requesting the Bishop site to be removed from the Draft HEU Plan.

Thank you,

JC Greenberg 1033 Hedgeside Ave (707)738-7100



change.org



What's new Petition details Comments Upc



STOP THE RE-ZONING OF THE RURAL "BISHOP SITE" TO HIGH-DENSITY HOUSING

216 have signed. Let's get to 500!

At 500 signatures, this petition is more

Take the next step!

 From:
 MARK HOMER

 To:
 Hawkes, Trevor

 Cc:
 Mark Homer

Subject: Rezoning of Hedgeside Avenue Bishop Cattle Property

Date: Tuesday, July 5, 2022 3:02:12 PM

[External Email - Use Caution]

Mr. Hawkes,

My name is Mark Homer and my residence is at 1023 Ross Circle in Monticello Park. My wife and I have lived here 24 years. This weekend I received a notice from SaveHedgeside.com concerning the rezoning of the Hedgeside Avenue Bishop Cattle Property down the street from us. I know this property well as 20 years ago one of their steers got loose, stomped up my front yard leaving massive piles of manure all over our yard. The mailman chased the steer down the street in his van until it was eventually caught. It makes for a good story.

Aside from one transient cow, I've always thought the cattle ranch was a good use of that property being it's in a floodplain. So I was taken back by the word of a possible rezoning on the property. Napa County has a long history of preserving agriculture land and any changes to this zoning usually involve a lot of public discourse. The SaveHedgeside.com folks are fairly vague about the issue, mostly just raising concern. On the other hand, I've heard nothing from the County on the matter and usually there is some transparency on these issues. I would greatly appreciate any information you can relate on this matter.

Thanks in advance for your help.

Mark Homer

From: <u>ruralangwin</u>
To: <u>Hawkes, Trevor</u>

Subject: Draft Housing Element Update Comments **Date:** Tuesday, July 5, 2022 8:32:57 PM

[External Email - Use Caution]

From Kellie Anderson 445 Lloyd Ln. Angwin CA

Hello Trevor,

Please accept my comments and questions below. I have copied statements, programs and policies from the draft here which require additional information or further investigation.

1) "Program H-2j had limited effectiveness in preventing the conversion of mobilehome parks to other uses. This program will be modified for the 6th Cycle Housing Element."

"Policy H-2i: Encourage the rehabilitation of mobile home parks to retain existing affordable units and/or provide new affordable units. To the extent allowed by law, prohibit the conversion of mobile home parks for replacement by housing for vacation use, second homes, or transient occupancy."

No effectiveness occurred at all during the last housing cycle. Vineland Vista and Glass Mtn Mobile Parks may be lost to proposed other uses. How is this happening? Why is Staff not engaging mobile park owners at least annually to explore programs to retain mobile homes?

2)" During the interactive workshop, members of the public were asked about what they like about housing in their community, what housing challenges they have faced in their community, and what the County could do to meet the community's housing needs. Attendance for the workshop was consistent with attendance at other County public events, with roughly 40 participants."

Yet...."Meeting participants provided County staff with some feedback on Housing Element outreach activities. They indicated that information is not reaching the Hispanic community and the community does not feel included, that meetings are not set up to reach them, and that there is a generation gap in terms of who will participate."

When did outreach to under represented populations actually happen? Is there a list of the participants? The community engagement has been inadequate.

3)"The outreach process also included a range of types of activities, including scheduled meetings and community workshop, County staff attendance at community events to involve members of the public that might not attend a community meeting, and opportunities to provide extensive feedback online. "

What community events did staff attend? Who, what ,when, where?

4)"With respect to its housing rehabilitation objectives for the 5th Cycle, Napa County worked with Habitat for Humanity to assist one mobilehome owner whose unit was in need of replacement and is currently in the process of assisting with a second mobilehome unit. With respect to the County's housing conservation objectives, the County was successful in conserving and maintaining its three farmworker housing centers; however, it was not as successful with its objective of conserving mobilehome units. The County has lost a number of mobilehome units due to fire (58 units, including 44 units in Spanish Flat Mobile Villa, 13 units in Mund Mobile Home Park, and one unit in Capell Valley Mobile Homes Park). The County has considered the effectiveness of the 5th Cycle Housing Element goals, policies, and programs in completing updates to incorporate into the 6th Cycle Housing Element Update, which are presented in the chapter that follows."

Why is the loss of Vineland Vista Mobile Home Park south of St. Helena for proposed Hall Hotel not mentioned? This is disingenuous to omit this proposed conversion and blame the loss of mobile homes entirely on fires.

Why is the conversion of the Glass Mountain Mobile Home Park omitted? This Draft must be corrected to include the County's failure to prevent conversion of these mobile home parks!

5)"Program H-2j: Maintain the affordable housing provided in existing mobile home parks to the extent permitted by State law. Existing mobile home parks may be redeveloped, including adding up to 25 percent more units than the number of units allowed by their underlying zoning, provided that the adverse impact of such redevelopment on existing residents, including impact to housing affordability and displacement, is fully analyzed and mitigated. Rezone sites to allow MHP use only.

Objective H-2j: Discourage conversion of existing mobilehome parks to other uses. Conversion density bonus – Ongoing; rezone for exclusive MHP use by December, 2025. PBES"

Why not say preclude conversion of existing mobile home parks rather than discourage?

5)"Program H-2k: Continue to allow infrastructure improvements as an eligible cost under the Affordable Housing Ordinance, and work with affected agencies to pursue grant money to improve water and sewer infrastructure on the 6th cycle sites within the inventory and other sites that accommodate lower-income housing to address RHNA requirements." "Objective H-2k: Assist in application for at least one grant for water and/or sewer improvements on a site identified in the 6th Cycle Housing Sites Inventory. Ongoing; work to pursue grant funding to assist at least one project during the planning period. CEO, Housing and Homeless Services Division"

This program could help to upgrade sewer capacity for Bishop and Altamira sites.

6)"Program H-4e: No Net Loss Monitoring. If sites are developed during the planning period at lower density or at a different income level than shown in this Housing Element, make findings required by Section 65863 to determine whether adequate sites exist at all income levels. If sites are inadequate, take action to make adequate sites available within 180 days."

"Objective H-4e: Ensure that adequate sites are available throughout the planning period to accommodate the County's RHNA at all income levels.

Ongoing; whenever entitlements are granted for development on Sites Inventory parcels at a lower density or at a different income level than shown in the sites PBES"

"The prior identified sites, as listed in Table 5 above, were not considered adequate to accommodate lower income needs for the 6th cycle and were not carried forward for this 6th cycle sites inventory. However, to make these sites more attractive for development in the 6th Cycle, the 2023 to 2031 Housing Element Update includes Program H-2g which calls for evaluating and modifying (i.e., reducing) the affordable housing requirements on the AHCD sites established in the 5th Cycle or earlier."

Why do we allow sites to be rezoned with the AHCD overlay and then allow them to de developed at market rate? Does it make sense? Why would we reduce the AH requirement?

7)"For rehabilitation, the County's quantified objectives for are tied to the County's objectives for Program H-1a, which call for assisting with the rehabilitation of two units occupied by extremely low-income households, four units occupied by very low-income households, and four units occupied by low-income households."
"Napa County's housing conservation objectives include three very low-income units, ten low- income units, and ten moderate-income units."

Where are the details of these programs? I have observed several vacant red tagged housing units in Angwin. How can we engage property owners to resolve violations effectively and get these units back in service? The objectives noted lack a mechanism to initiate and complete rehabilitation, and the proposed number of units is insignificant.

8) "1. Located outside of high and very high fire severity zones as designated (in State Responsibility Areas) or recommended (in Local Responsibility Areas) by CalFire."

Has Spanish Flat been 'recommended?' As Spanish Flat Mobile Villa and nearly all homes in the area were lost in the LNU Fire and three lives were lost, the inclusion of Spanish Flat relies on a cruel loophole in fire severity ranking and it is an unacceptable location due to fire risk.

9) "3. Proximate to transit routes and/or employment opportunities and services (e.g., groceries) where possible."

Does Spanish Flat meet this criteria?

10)"Potential Use of the Adequate Sites Alternative (65583.1(c))

As a possible approach, there are some conditions under which the County could address up to 25 percent of its adequate sites requirement by substantially rehabilitating existing units, converting existing units to affordable units, or where existing unit affordability is preserved (including mobile home spaces). Examples include conversion of hotels or motels to residential use and making them available for people experiencing homelessness or by preserving a mobile home park via acquiring spaces. While this option was considered as part of the site evaluation process, the County determined that this alternative approach would not be viable in meeting the general evaluation considerations or needed to accommodate the County's RHNA."

Given the imminent threat the an existing hotel on Lodi Lane, currently housing approximately a dozen working families, and the potential for conversion of the mobile Home park at Moskowhite Corner, the Adequate Sites Alternative is dismissed with out adequate exploration by Committee or public. This Alternative should be included in the Housing Element.

11) "Description of Sites and Factors Supporting Development: The parcel is privately owned and is located at the intersection of Trancas and Big Ranch Road. The owner expressed interest in developing housing in the past and rezoning a 1.5-acre portion of the parcel fronting on Big Ranch Road to RM would allow for housing development at a minimum of 20 dwelling units per acre on that site unless constrained by site characteristics. Based on the expectation that an existing single-family home on the property may be retained, the anticipated development would provide 25 units. The housing development would obtain City of Napa and Napa Sanitation District water and wastewater services."

Site #4 Big Ranch Corner. Why would existing unit be retained? It is very small vacant, single story home and could be relocated and rehabilitated off site? Could this site support a larger number of units?

My brief thoughts for now.

Respectfully,

Kellie Anderson Angwin