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## KEEP NAPA'S GATEWAYS GREEN

August 5, 2024

### **Napa County Planning Commission**

### **Napa County Board of Supervisors**

c/o Trevor Hawkes, Supervising Planner

Napa County Planning, Building & Environmental Services Department

1195 Third Street, Suite 310

Napa, CA 94559

Dear Members of the Napa County Planning Commission and Board of Supervisors,

KNGG submits this letter once again with a keen sense of irony to express our profound opposition to the proposed changes to the re-zoning ordinance for the Foster Road site, which you are set to discuss on Wednesday, August 7, 2024, at 9 AM. These changes, cloaked in the guise of progress, are but the latest in nearly two decades of artful maneuvering and misdirection by privatized interests and various governmental officials in both Napa County and the City of Napa.

The latest draft omnibus housing ordinance introduces pernicious changes that threaten the very fabric of our community and the Prime Ag/Grazing Lands that members of communities have so valiantly endeavored to protect since 2007. Though the full Housing document is too voluminous to include here, you may refresh your memory and peruse it at your leisure via this link: [Redline

Please allow us to elucidate the critical issues that demand your immediate attention and refusal:

**1. Unrestricted Supportive and Transitional Housing in AP and AW Zones:**

- **Section 18.16.020, subd. (N):** Allows supportive and transitional housing in Agricultural Preserve (AP) zones without the need for use permits.
- **Section 18.20.020, subd. (U):** Permits similar developments in Agricultural Watershed (AW) zones without use permits.
- These allowances are purportedly based on Government Code section 65583, subd. (c)(3), which decrees that such housing should be treated as residential use, subject to the same restrictions.
- However, as multifamily and mixed uses are not generally allowed in AP and AW zones, the code does not mandate supportive housing by right in these zones. The County's interpretation is, to put it kindly, a creative misreading likely (mis) influenced by existing allowances for small family care homes.

**2. Increased Residential Care Facilities:**

- **Sections 18.16.030(M) and 18.20.030(Q):** These revisions now permit medium and large residential care facilities in AP and AW zones with use permits, thus opening the door to more extensive developments than previously permitted.

**3. Elimination of Affordable Housing Requirements in RM Zones:**

- **Section 18.60.020:** This section has been REVISED to remove the requirement that projects in Residential Multiple (RM) zones, such as Foster Road, include 20% affordable units to obtain by-right multifamily approval.
- This is a particularly and egregious betrayal of the public trust, as the affordability requirement was a key justification and cornerstone of Napa County's zoning change and its removal is a blatant betrayal of that promise to the public.

The removal of the affordable housing component and the unrestricted development allowances in AP and AW zones lay bare the County's true intentions—favoring developers over the

community. This "bait and switch" tactic, though elegantly executed, is both misleading and wholly unnecessary. As you may realize, the County's Housing Element, as per Supervising Planner Trevor Hawkes, already meets and exceeds state requirements through other projects, including ADUs and the Napa Pipe Project. Thus, rezoning these Prime Ag/Grazing lands is a superfluous exercise in sophistry.

This proposal mocks the planning process and disregards the voices of the community, who have staunchly opposed this re-zoning since 2007. It appears to be a flagrant giveaway to private developer interests, skillfully navigated through a labyrinth of governmental processes.

We implore the Napa County Planning Commission to reject this proposal. The elimination of the affordable housing requirement, the circumvention of environmental reviews, and the unnecessary rezoning demonstrate a palpable disregard for public trust and responsible planning. This is an opportunity to rectify a situation fraught with dark implications for the County and its citizens.

Please, let us all prioritize the interests of the community and preserve our Prime Agricultural and Grazing lands from this unwarranted, needless and unjust development. We ask that you act in the best interest of Napa County's residents, our communities, our agro-tourist economy, our environment and uphold the integrity of the planning process and a sustainable future which follows smart growth directives - not disavowed urban sprawl.

Thank you for your attention to this most critical matter.

Sincerely

Christiane Robbins

For KNGG

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Napa, CA 94558