

May 12, 2024

Napa County Board of Supervisors:  
% Trevor Hawkes  
County Administration Building  
1195 Third Street, Suite 305  
Napa, CA 94558

*Re: Proposed Ordinance Amending Title 17 and 18 of the Napa County Code implementing the Housing Element of the Napa County General Plan.*

Dear Honorable Board of Supervisors:

Thank you for the opportunity to comment on the County of Napa's proposed Ordinance. Unfortunately, many members of the community are unable to make it to tomorrow's meeting due to professional work and family obligation. This letter will serve in their stead.

As a deeply concerned residents of Napa, Again we are compelled to address the transformative proposed up zoning ordinance specific to the issues of Foster Road—known locally as the Ghisletta Lands—from AW:UR to RM:UR.

This proposal ordinance is not just a technical adjustment but a potential redefinition of our landscape, the Napa Valley itself, again demanding rigorous scrutiny and thoughtful deliberation by the Board of Supervisors.

The Environmental Impact Report (EIR) included in the 2023 Housing Element is a document purported to be comprehensive, yet it is rife with inadequacies and inaccuracies, failing to capture the profound environmental impacts of converting prime agricultural lands into multi-family housing. Your earlier re-zoning marks the initial phase in what could become an widely and publicly disavowed means of urban sprawl facilitated by a coalition of County, City of Napa, and private interests. This transformation threatens the Agro-tourism and iconic character of Napa, a character that must be protected while aligning itself with 21st century challenges and values.

Despite the CEQA findings and EIR approval on January 23, 2023, this proposed ordinance continues to disregard a decades-long outcry from a broad spectrum of Napa's communities. The proposed Ordinance is not a mere technicality; it is a miscarriage of policy and stewardship and represents unacceptable curtailing of citizen rights. We urge a course correction through a refusal of passage of this proposed ordinance, grounded in the following points:

1. **State Housing Laws and Compliance:** State housing laws are not a blanket permission for unchecked development. They require cities and counties to identify and support housing development, but Napa's proposal goes far beyond these requirements. The proposed ordinance not only rezones Foster Road for multi-family development but also grants **by-right approvals**, eliminating essential environmental reviews. This bypasses the need to scrutinize significant site challenges—including active fault lines, floodplain hazards, and the presence of cultural and environmental/biological treasures—neglecting the essence of responsible planning.

2. **Environmental and Community Impact:** By eschewing required environmental reviews, the County's proposal risks significant public harm for private gain. The ordinance must be revised to ensure discretionary reviews that rigorously assess and mitigate environmental impacts. The site's challenges are too numerous and severe to ignore, from seismic vulnerabilities to potential heritage resource disruptions. This proposal's current trajectory is a path to irreversible damage and ill-considered and needless overdevelopment.

3. **Agricultural Land Protection:** The proposed ordinance's prohibition of agricultural uses on Foster Road is a betrayal of Napa's agricultural heritage. If multi-family housing is deemed unfeasible due to environmental constraints, the land should revert to its intended use—agriculture, as enshrined in Measures J and P. The current form of the proposal disregards these measures, sacrificing our agricultural legacy for expedient development.

4. **City of Napa's Housing Element:** The Foster Road site, within the City of Napa's sphere of influence since 2005, is conspicuously absent from the City's Housing Element as an opportunity site. This notable omission is a critical oversight. The County Board must recognize this gap before proceeding with any proposed ordinance decisions. The City's Housing Element failed to analyze the site's development impacts, neither did the County's, thus leaving a gaping void in environmental accountability and governmental responsibilities..

5. **CEQA and Environmental Review Requirements:** The County's cavalier approach to CEQA requirements is alarming. **Allowing by-right development without future environmental review defies the very purpose of CEQA.** The Housing Accountability Act mandates that CEQA still applies to projects, ensuring thorough environmental scrutiny. The County's proposal undermines this mandate, threatening to unleash unchecked development with potentially catastrophic consequences.

26. **Ministerial vs. Discretionary Approvals:** State policy does not endorse a free-for-all in housing development. The County's proposed ordinance goes beyond what the Housing Element requires, granting by-right approvals that eliminate crucial checks and balances. This proposal must be scaled back to allow for discretionary reviews that ensure comprehensive environmental and community impact assessments.

7. **Community and Environmental Stakeholders' Concerns:** The proposed policy changes drastically alter the approval process for multifamily projects, bypassing necessary discretionary review. This exposes the County to significant risks, including public safety hazards and financial liabilities. The current EIR fails to address substantial environmental impacts, rendering its conclusions not just inadequate but dangerously misleading. The predicate EIR of the Housing Element does not accurately assess the impacts of proposed ordinance affecting Foster Road, particularly given the significant policy changes affecting multifamily housing development in RM:UR zones.

In sum, again the proposed ordinance affecting the Prime Ag lands of Foster Road is a reckless and irresponsible gamble with Napa's future, underpinned by an EIR that is fundamentally flawed. Again, we urge the County Board of Supervisors to rectify these significant shortcomings, postponing any re-zoning decisions until a thorough reassessment can be conducted in accordance with CEQA and current state laws. This reassessment must include a comprehensive analysis of all potential environmental impacts, meaningful stakeholder engagement, and transparent communication of all findings.

We remain steadfast in our commitment to balancing affordable housing with environmental stewardship. There are ample existing housing sites available in Napa County that represent furthering smart growth initiatives for urban in-fill as opposed to devastating Prime Ag and Grazing lands. We ask- we trust - that you will consider these concerns with the gravity they deserve and take decisive action to ensure a responsible and sustainable path forward.

Thank you for your attention to this critical matter and for not voting for this proposed ordinance..

Sincerely,

ON behalf of KNGG  
KEEP NAPA'S GATEWAYS GREEN  
NAPA, CA 94558

## Quackenbush, Alexandria

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**From:** Hawkes, Trevor  
**Sent:** Tuesday, July 16, 2024 10:22 PM  
**To:** MeetingClerk  
**Subject:** FW: County of Napa Planning Meeting of July 17, 2024

**Categories:** PC

Public comment for 8A

**From:** Katherine Lambert, AIA <kl@map-ca.com>  
**Sent:** Tuesday, July 16, 2024 4:21 PM  
**To:** Hawkes, Trevor <trevor.hawkes@countyofnapa.org>  
**Subject:** County of Napa Planning Meeting of July 17, 2024

[External Email - Use Caution]

**Trevor Hawkes**, Supervising Planner  
Napa County Planning  
Building & Environmental Services Department  
1195 Third Street, Suite 310, Napa CA

Dear Mr. Hawkes,

The gateway to Napa Valley, designated as Prime Agricultural by the Local Agency Formation Commission (LAFCO), represents the foundation of Napa Valley's agricultural excellence and stature. The re-zoning decision, approved at the BoS meeting, endangers the very soil that has made Napa an emblem of world-class viticulture and sustainable farming.

I must share my profound concerns to you as a resident of South Napa.

I object to the following decisions rendered by the Napa County Board of Supervisors:

- **DISPENSING OF REGULATORY REVIEWS:** Foster Road's designation as Prime Agriculture Land by LAFCO requires that any development proposal on such land must navigate a complex regulatory landscape and address multiple layers of environmental, legal and policy considerations. **This LAFCO designation of Prime Agricultural Land should not be dismissed and deemed irrelevant by the County.**
- **MISLEADING NARRATIVES:** During the previous BoS meeting, the Napa County Planning Commission's representative seemingly gave an **inaccurate presentation of H4d and H2 as State of California legal mandates requiring by-right development.** Apparently State law does not require by-right development of the Foster Road site. The County's inclusion of by-right development could lead to significant, possibly unnecessary and irreversible, changes without any due diligence or environmental consideration.
- **"CHANGING ZONING AT ALL COSTS":** The County's consultant, Gen Housing, presented the need for housing in Napa - a need which is unquestionable and doable. Unfortunately, they neglected to address the crucial balance between smart growth development, environmental preservation, and climate resilience concerning the Foster Road site. Their 'changing zoning at all costs' approach **blatantly disregards smart**

growth directives of urban infill and threatens an icon of our Agricultural and Cultural Heritages and mainstay economic drivers such as Agro-Tourism.

- **MISGUIDED PUBLIC POLICY DECISIONS:** There is a real danger that the BoS may have made **decisions based on inaccurate information** resulting in potentially misguided public policy decisions and possibly undermining public trust.
- **UNNECESSARY AND SHORTSIGHTED:** What makes this re-zoning decision even more perplexing is that it is entirely unnecessary. There are **viable existing alternatives to accommodate Napa's housing needs** without exploiting these prime agricultural lands. Sites like Napa Pipe (currently in development and under capacity) offer ample opportunity for fully vetted development without sacrificing the region's agricultural heritage.
- **A LONG PLANNED STRATEGY:** The decision to re-zone from agricultural watershed to high-density residential mixed-use appears to be the culmination of **years of planning by private interests** in collaboration with pliable public officials and local NGOs, suggesting that profit margins are being prioritized.

I am writing in opposition to your following recommendations for re-zoning to the Housing Amendment to be put forth for discussion at the July 17th:

Section 18.16.020: Uses allowed without a use permit. This section is amended to allow the following without a use permit in the Agricultural Preserve (AP) zone: medium residential care facilities, accessory dwelling units, supportive housing, and transitional housing. Guest cottages would be deleted from the list as they would be covered under accessory dwelling units.

Section 18.18.020: Uses allowed without a use permit. This section is amended to allow the following without a use permit in the Agricultural Watershed (AW) zone: medium residential care facilities, accessory dwelling units, supportive housing, and transitional housing.

Thank you for your thoughtful consideration of the people's voices of Napa.

All Best,

Katherine

Katherine Lambert, AIA, Founding Principal  
MAP / MAP Studio  
Architecture + Design + Media  
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Napa, CA 94558  
[www.map-studio-ca.com](http://www.map-studio-ca.com)

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Sent with [Proton Mail](#) secure email.

**FW: Napa's Public Meeting this morning, 9AM, Wed, 07.17.2024**

Hawkes, Trevor <trevor.hawkes@countyofnapa.org>

Wed 7/17/2024 8:03 AM

To: MeetingClerk <MeetingClerk@countyofnapa.org>

Public comment item 8A

**From:** AIM\_Keep Napa's Gateways Green <KNGG\_Napa@proton.me>

**Sent:** Wednesday, July 17, 2024 7:51 AM

**To:** Hawkes, Trevor <trevor.hawkes@countyofnapa.org>

**Subject:** RE: Napa's Public Meeting this morning, 9AM, Wed, 07.17.2024

[External Email - Use Caution]

Thanks so much for your quick response. As you may realize, for some reason KNGG is not on the Napa County's email list (despite requests and known public interest) so we simply received a top page notice of this meeting. Otherwise, we would not have bothered you.

Thanks again for getting back to us.

KNGG

<https://www.savefosterroad.org>

" In its very essence urban planning resides in a plurality.

One must resist the impulse to underestimate the complexities and the collective intelligence of communities. A synergy and reciprocity arises when each of us makes a concerted effort to listen to the other, when mutual respectful and social intelligence is engaged throughout the planning process."

*Christiane Robbins, 2022*

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On Wednesday, July 17th, 2024 at 7:44 AM, Hawkes, Trevor <trevor.hawkes@countyofnapa.org> wrote:

KNGG,

This morning's Planning Commission meeting will be available for remote attendance through our agenda portal. Once the meeting is done the video of the meeting will be posted relatively soon thereafter. Please refer to page 2 of the attached agenda for remote attendance options.

[Napa County - Planning Commission \(legistar.com\)](https://legistar.com)

Please note today's meeting is a workshop for informational purposes. Staff is not asking the Planning Commission to make any recommendations to the Board at this time.

**From:** AIM\_Keep Napa's Gateways Green <[KNGG\\_Napa@proton.me](mailto:KNGG_Napa@proton.me)>

**Sent:** Wednesday, July 17, 2024 7:22 AM

**To:** Hawkes, Trevor <[trevor.hawkes@countyofnapa.org](mailto:trevor.hawkes@countyofnapa.org)>

**Subject:** Napa's Public Meeting this morning, 9AM, Wed, 07.17.2024

[External Email - Use Caution]

Good Morning,

As you may recognize, numerous members of the Napa community are unable to attend your public meeting re: the Ordinances 17/18 this morning due to work, professional obligations as well as family commitment and vacation schedules. As such, we are requesting that this public meeting be also available online as well as videotaped and then posted online for archival public viewings. You may already have prepared for this given that the Napa County has such preparations in place, we are simply unaware if it is in place. We anticipate that this should be no problem to accommodate this request by the public. Please advise further.

Thank so much

KNGG

<https://www.savefosterroad.org>

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*Christiane Robbins, 2022*

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