

May 6th: Your Letter re: the Draft EIR really does matter!!!

California state law requires zoning to be consistent with the City's General Plan.

It is often possible, however, that the existing zoning which conforms to the General Plan can be changed (to a more intensive use, for instance) and still be consistent because General Plan land use designations are more broadly defined. Amendments to the General Plan may also require a subsequent rezoning to provide consistency. Unincorporated land may also be pre-zoned by exactly the same process as rezoning. The zoning then becomes effective upon annexation.

This guide pertains to all rezoning and pre-zoning actions..... <https://mtshastaca.gov/wp-content/uploads/2020/07/rezoning.pdf>

Of course this indicates as to why the City of Napa's Planning insisted that the Gateway Properties be approved by GPAC and then included in the Draft General Plan Napa 2040.

Briefly, your responses are due for submission (email) to the City of Napa by 5PM, Friday, May 6th (<https://napa2040.com/contact-us>). The importance of all of our participation via letter writing (as short or long as you can). cannot be underestimated. These letters are what the City and County pays attention to as these can be quantified - much like a petition or a survey!

In general, KNGG points remain ... and they have not yet been adequately addressed in the City's voluminous Draft EIR. These issues need to be fully clarified and reasonable alternatives offered and clearly delineated by the City, so that we all are aware what is actually being proposed in these very uncertain and demanding times.

Pick & Choose / Cut & Paste for your letters - as to what is closest to your heart !

• **Water....waterwater** ... during our 20 year extreme drought the questions beg: where is it coming from at what cost and to whom ... and what are the safety factors re: quality ... and what happens if the well runs dry ???

• **The USDA/LAFCO designated these parcels as Prime Agricultural Land (146 acres) - the “Last Crop” in Napa - it is irreplaceable.**

• **This proposed development represents one of the largest - if not the largest - developments in the History of Napa - a city within the city.**

• **The super-sized scale of this proposed development is a result of the City and the County not building as they were required in past decades.**

• **Now, the City is taking the easy way out and proposes to devastate the “Last Crop” of AG lands - a much needed resource for the residents and farmers of Napa.**

• **Other sites such as Napa Pipe and the Gasser sites were developed on fallow, industrial lands or County lands that were improved by responsible development. They were not the AGW lands of the Gateway Parcels that would be devastated and lost forever to future generations.**

• **The City has failed to even use their own identified sites for housing development (Housing Element 2015) which is expected to yield about 1500 + units. Or to even annex existing county islands that are within the City limits that would yield innumerable possibilities.**

• **They have not proposed affordable housing and workforce housing (to similar magnitudes) to be located throughout all of Napa - seemingly not in the neighborhoods of City Officials.**

• **In fact, they are not even considering this area a neighborhood ! Regardless of our tax base, our neighborhood has been vaporized in the eyes of the City. It is now relegated to a tag line of the “Foster Road Mixed Use corridor”, complete with expanded roadways on Foster Road and a truck channel on Golden Gate Ave.**

• **Traffic congestion, pollution and noise are already a hardship for many - akin to the Santa Monica Freeway in some parts! Imagine the influx of this proposed development + Napa Pipe + all of the Hotels and other developments in the Planning pipeline. An ensuing nightmare may well be an understatement.**

• **Elevated, unhealthy levels of Air, Water, Noise, & Light Pollution are all severe consequences to the residents of Napa by way of this proposed development and increased Traffic. Reportedly, Napa already has**

some of the highest cancer rates in the state/country. We do not wish to take the #1 spot! Yes, electrician will provide some answers but they are not spelled out nor is the time table of policy requirements - nor are mechanisms of accountability

- **Green House Gas Emissions are not unavoidable" as stated in the Draft EIR. These parcels (grasslands) serve as an important carbon sink (sequestration) that Napa desperately needs and ought not be displaced for the proposed commercial/housing development.**

- These parcels are officially designated as an **Alquist-Priolo Earthquake Hazard Area. They contain a wide swath of an active - very active - West Napa Fault line running the full length of the Ghisletta parcels.** Anxiety inducing if not negligent to site any development, let alone housing, on these parcels. Will the City be held liable? If so, who will bear responsibility for paying out any possible lawsuits - city taxpayers ?

- These parcels are in a **FEMA designated Flood Plain** - That's right , the Sea-level rise is an issue!

- These parcels are in a **FEMA designated Landslide area.**

- What little has been left of **the Watershed in West Napa will suffer significant degradation** as a consequence of this proposed development.

- As a consequence of the proposed commercial/housing development, **this may well prove to be a prime wildfire risk to all residents** as it significantly reduces and infringes on the WUL (Wildlife Urban Interface) - possibly similar in character to the recent Coffey Fire in Sonoma and possibly more dangerous due to its proximity to Hwy. 29 and cutting off the primary exit for the Napa Valley.

- There are a host of other Environmental Issues including **endangered species**

- **The City has continued to ignore the public outcry** for decades that these AGW parcels not be annexed, up-zoned and developed. In its own General Plan 2040 Survey at least 77% voiced opposition to developing lands at the City limits. In 2007/08, almost 6,000 names signed a petition requesting that the City NOT annex, up-zone and develop these very same parcels. Even the Bank of America has stated: "*We can no longer afford the luxury of urban sprawl.*"²

- **Aboriginal/ Native American Grounds that speak to cultural /**

historical /religious significance and racial equity.

- A rare 18th century **Historical Significance - General Vallejo's Stage coach stop.... an homage to Latinx Culture .**

- Reportedly, the **Ghisletta parcels were a Toxic Dumping Site for the County of Napa** in the 1970's/80's, as the City of Napa refused the toxic waste.

- **Protected View-shed Corridors will be impacted** - without question despite development go-arounds and happy face speak.

- **The Iconic Napa Gateway** - the 75 year old world-wide branding and economic underpinnings of the Napa Valley, itself will be transformed into suburban sprawl.

- **Mortgage and Insurance may well be extremely difficult - if not impossible - to obtain...** even for developer/property owners.

- **Infrastructure costs will be prohibitive as proposed** and will be passed on to whom exactly, by what processes and mechanisms of accountability?

- As you can see **these Gateway parcels have the same site constraints as the Napa Oaks and Timber Hill Development Projects which recently received Greenbelt** recommendations by the City's GPAC and Planning Commission. WHY remains a salient question despite the City's hollow protests of the SOI and RUL around the Ghisletta Parcels.

- **Population #s / Housing # Forecasting:** In regard to the City of Napa's Draft General Plan 2040, some of prime concerns revolve around housing numbers. - specifically the ones being used to forecast the population increases for the City of Napa. **Contrary to popular opinion, the population numbers for Napa have been decreasing - NOT increasing** - as we have been led to believe. Last year KNGG requested verification of the accuracy of the Housing Numbers included in various iterations of the Draft General Plan 2040. As explained in my letter to the GPAC, 01.11.2021 which remains unanswered:

- 3. " **This newest draft proposal from GPAC remains based on incomplete, out-dated and inconsistent foundational data points.** Upon earlier concerns raised by PNG/SFR, more specific and foundational information was requested by the Planning Commission on 09.17.20. It was to be provided by the Planning Division and be submitted by 11.05.20. This did not fully take

place as expected. Therefore, the GPAC proposal (as now drafted) is premature. It places any potential General Plan 2040 proposal and the City of Napa itself at risk - subject to the vagaries of possible future revelations and determinations.

- Specific to category, the “Population Trends: City of Napa” the projections cited by D&B are inconsistent with population projections that they, themselves, cite as disseminated by The California Department of Finance (DOF), Demographic Research Unit. **The DOF forecast (link below) indicates that the population growth of the county is projected to increase by 3,979 by 2040. It is NOT projected to increase by 16,822 as cited by D&B.** This disparity represents D&B 's seeming overestimate of 12,843 of population growth - approximately a 66% overestimate in population growth for the County of Napa - of which the City is but one part.

- **This questionable projection figure of 16,822 is serving as a foundational projection for this GPAC draft City of Napa 2040 General Plan Proposal** and the City of Napa’s Planning Division’s Napa 2040 General Plan. It represents a critical difference in population projection and projected housing needs". <http://www.dof.ca.gov/Forecasting/Demographics/projections/>

Whew!!!

All in all, you may reach a similar conclusion that as it stands the City’s proposed annexation, up-zoning and development is,
at best, unreasonable and, perhaps, untenable.

As one member of KNGG succinctly states:
“ IT IS BAD FOR NAPA.”

KNGG is advocating for a MORATORIUM of this proposed annexation, up-zoning & development, until we arrive at a moment of clarity and certainty as to exactly what resources are in hand, knowing what interests are underpinning and being served.

What will the true cost to the City and County of Napa be as a consequence of this Draft General Plan Napa 2040 + DEIR - who benefits?

There is simply too much uncertainty - on all levels - and far too much at stake.

As always, many thanks for your efforts and support to ensure that our City fulfill its promise to itself.

Christiane Robbins

KEEP NAPA'S GATEWAYS GREEN

(www.savefosterroad.org)