

**From:** [Pease, Kathy](#)  
**To:** [Morris, Erin](#); [Natalie Noyes](#); [Kathy Pease](#)  
**Subject:** Fwd: DEIR  
**Date:** Thursday, September 05, 2019 5:04:39 PM

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**From:** S R-H <napasusan@hotmail.com>  
**Sent:** Thursday, September 5, 2019 5:02 PM  
**To:** Pease, Kathy; S R-H  
**Subject:** DEIR

[EXTERNAL]

City of Napa Planning Department

City File No.PL17-0114

Comments and questions regarding the Valle Verde and Heritage Project Draft Environmental Impact Report

With our current Climate Crisis why doesn't the DEIR address Climate Change? What measures has the City implemented to protect its citizens during droughts, flooding and extremes in weather? Are current City Planning department members and the Planning Committee familiar with the Big Ranch Specific Plan?

It has been suggested that such a development as the "Project" and the funds designated for it can only be accomplished if the Valle Verde Apartments and Heritage House are both approved. What other sites have been explored for this kind of development? Have funds only been pursued for this address or location? If alternative sites, outside of this special flood hazard area, were studied, why were they rejected?

Has the City of Napa only supported this location to meet "its Regional Housing Needs Allocation (RHNA) 2 obligation identified by the Association of Bay Area Governments (ABAG/MTC) for affordable housing and confirmed by the California Department of Housing and Community Development (HCD)"?

For this development, at this location, doesn't the city need to approve a lot line adjustment of Valle Verde and Sunset/Heritage, give a portion of a public street to this development, and allow the placement of fill where historically, two creeks merged? Doesn't this development require a "Streambed Alteration Agreement" from California Fish and Wildlife (CDFW)? While other cities seek to rejuvenate their creeks, such as Los Angeles and San Francisco, why would Napa continue to destroy theirs?

"The Project is located partially in a FEMA Special Flood Hazard Area (Zone AE floodplain) and partially in a 500- year Zone X associated with Salvador Creek (see Figure 3.10-1). The Site is also mapped within the City of Napa's Floodplain Overlay Zoning District Map." (Page 129)

The Project proposes to install two bio-retention facilities that would temporarily detain and release storm water (Page 134). When the project properties flood, where would these waters be held? If the base flood elevation (BFE) is changed (for better or worse), and the grading redirects the flood flows (Page 134), where will these floodwaters be re-directed to?

Is the City of Napa aware that when we approved the assessment on ourselves for the Napa River Improvement Project, though the Salvador Creek watershed neighborhoods (Linda Vista and Vintage), paid their assessments, these neighborhoods did not benefit?

Are current City Planning department members and the Planning Committee familiar with the Big Ranch Specific Plan EIR (BRRSP)? Initially, the density designation at the project site was one of low density, what conditions changed so that the property was changed to one of high density? What conditions make higher density a viable use of the land?

From the Planning Commission meeting of 5/2/96 [Page 3-170, comment 45-5]: “**Helen Zerba**, 2119 Big Ranch Road, expressed concern that the consultant has not looked at the storm water system. She has lived in the area for 30 years; last year was the first year that water entered her house. ...She suggested the consultant take a better look at the storm water system because there are no longer little reservoirs that used to be on the other side of the creek. ...During a heavy rain comes down goes into the creek and floods. And the heavy flow is taking the land away.”

Response in part [page 3-172] “The loss of floodplain storage due to past development could have resulted in a worsening of the flood situation...Channel setbacks are the most critical of the incorporated mitigation measures from the standpoint of flooding. These setbacks and zero net fill floodplain policy, if implemented would ensure that the existing situation would not deteriorate further.” Furthermore the writer acknowledged at that time there are: downstream flooding, erosion, sedimentation, and stability impacts.

At the time of build out of the Valle Verde/Villa Lane neighborhoods, didn't the hydrologist stop short of the Helen Zerba property (now known as 3710 and 3720 Valle Verde Drive)? When neighbors along the Salvador Creek and those, north of the Silverado Creek Subdivision, began to complain of flooding, it was suggested we form the “Salvador Creek Stewardship” group. It was suggested that we clean up the garbage in the Salvador Creek and plant native plants (has anyone noticed that these suggestions did not lessen the flooding?). Ultimately, we were told that nothing could be done about the flooding. What conditions have changed since the build out along Big Ranch Road, Garfield Lane, and all points north and west within the City of Napa to increase the density?

It seems that the Napa Valley Joint Unified School District (NVJUSD), placed the property of Vintage High School on the market. With the potential of 60 or more homes, what water will potentially be added to the Salvador Creek? Aren't the cumulative effects of buildout reason for a new, independent hydrology study of the “Project” location and those downstream of the “Project”, if not the entire Salvador Watershed?

Is it accurate that recent special status species evaluation was not done on site but rather by data base searches (Pages 70 and 71)?

When the initial Steelhead survey was conducted on the Salvador Creek (2007), it was a drought year; shouldn't a survey be conducted during a normal or above normal rain fall year? Shouldn't studies be made during each season of the year, daytime, nighttime, dusk and dawn? Why are studies most concerned on what is not there? How are animals observed if they hide when they see, hear or smell us?

“California's immediately prior drought of statewide scale occurred in 2007-09; it was the first drought for which a statewide proclamation of emergency was issued.” [From CALIFORNIA'S MOST SIGNIFICANT DROUGHTS: COMPARING HISTORICAL AND RECENT CONDITIONS | FEBRUARY

Does the City know that some conditions for the better have occurred within the Salvador Creek? Beavers are known to have taken up residence in the North West corner of Vintage High School. Science tells us that Beavers have been shown to create better conditions for Steelhead.

Unfortunately, two invasive species of mosquito the *Aedes aegypti* (the yellow fever mosquito) and *Aedes albopictus* (the Asian tiger mosquito) have been found in California. These non-native bugs, they are black with white stripes, smaller (perhaps half the size of mosquitos we are used to) and bite during the day. They are a species of concern because they are potential vectors of disease. I believe at least one of the *Aedes* species lives in the area; aren't these insects considered a health hazard?

At night, bats are known to consume vast quantities of insects, particularly mosquitos. Bats are nocturnal. I have observed bats at dusk, at multiple locations along the Salvador Creek. How is it that the species determination can be made in the dark?

Hummingbirds are also known to live in the area. These birds are diurnal, they are important pollinators and they feed on mosquitos. Nuttall woodpeckers have been observed in the area and the riparian corridor is known to host multiple bird species.

"A total of 109 trees were documented within the Study Area, as summarized in Table 3.4-3 and shown in Figure 3.4-2. Protected trees appeared to be naturally occurring and were present along the northern, eastern, and western boundaries of the Study Area. Species that met the definition of "protected native tree" on private property within the Study Area include coast live oak, valley oak, and black walnut." (Page 74)

With the loss of these trees comes the loss of habitat; why isn't this considered a significant Impact? The California Fish and Wildlife Code states that it unlawful to take or possess a number of species, including bats. If their habitat is destroyed isn't that considered unlawful?

With the 56 special-status wildlife species, I see no mention of the Western Pond Turtle. There is no mention of the western pond turtle which is listed as "species of special concern" in California and (though, the habitat that was on the north side of the Gasser Creek was destroyed ~20 years ago), is known to live within the Gasser and Salvador Creeks and adjacent riparian habitat.

It stated that "the Project" is intended to serve the existing area population" (228, does that mean people the neighborhood is already acquainted with? Would it be accurate to assume that over all, residents would not have their own transportation or visitors who drive? Doesn't this project induce the "substantial growth or concentration of" a segment of the population in one location?

Please note, given the time constraints to address the DEIR, I feel this is inadequate. However, the most important is the inadequacy of the hydrology/flooding issues and the habitat of species.

Thank You,

Susan Rushing-Hart

73 Garfield Lane,

Napa, Ca 94558

