

September 14, 2019

Erin Morris
City of Napa
1600 First Street
Napa, CA 94559

CITY OF NAPA
CITY CLERK

2019 SEP -4 PM 4:44

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SEP 05 2019

COMMUNITY DEVELOPMENT
DEPARTMENT

Re: Environmental Impact Report for Heritage House and Valle Verde Housing – SCH#2018082019

Dear Erin and Members of the Planning Commission,
I am a homeowner directly across the creek from the planned project. I have comments regarding the following issues pertaining to the Environmental Impact report:

1. Salvador Creek habitat destruction by the proposed East Parking Lot
2. Zerba Bridge Removal
3. Systemic Neighborhood Safety Challenges + Environmental Challenges

1. Salvador Creek habitat destruction and intrusion by the proposed East Parking Lot

I STRONGLY OPPOSE the parking lot on the west side of Salvador creek.

The project currently includes a large parking lot along the west side of Salvador Creek. **The parking lot on the west side of Salvador creek should be removed from the plans.**

There are unacceptable environmental damages proposed by the project to support this parking. **We should fight to protect these unique natural treasures in our community** as they are all along the Salvador creek corridor. This may seem like a small section of creek, but it chops the creek into sections, with part of it celebrated north along the nature paths and part of it celebrated to the south section to Trancas Crossing park. Wildlife use the entirety of the corridor. This section of the habitat should not be treated differently by the Napa Planning department.

There is not enough set back from the creek to the building to include a parking lot. According to City of Napa Municipal Code – Streambed and Creek Protection: “Where the average depth of the bank is 8 feet or greater, the required setback from “the toe of the stream bank shall be two times the depth of the bank plus 20 feet unless special provisions for bank stabilization are installed as approved by the Public Works Director.” The EIR notes that the current parking lot is legally non-conforming, but I believe that proper setbacks should apply along all of Salvador creek. This parking lot runs up directly to the edge of the creek bank, with no set back at all.

Currently there is a loud, wonderful chorus of frogs, insects, and other creatures from dusk through the night. Birds, bats, fish, and animals live there in abundance among dense native plants. Introducing a noisy, bright parking lot would change all this, and it would be a loss for the wildlife as well the character of the neighborhood to the east of the creek.

Issues include:

- The proposal to reinforce the creek for this parking lot is disturbingly destructive. A gigantic concrete wall is proposed across the entire parking lot end, which will not at all protect the beautiful natural current state. This is bringing big city engineering practices and ugly interference into a unique and fragile natural creek setting.

- There are protected species in this creek, which we should protect: Steelhead trout, salmon, bats, birds, and trees. Mitigation includes, for example: “Wait until nesting season is over before removing trees and habitat.” What happens the following year when the animals try to return to destroyed habitat? This kind of mitigation is unacceptable for preserving our natural environment.
- Parking that backs up to the creek removes much-needed environmental buffer to the fragile creek habitat. Parking and inevitable car maintenance creates hazardous spills that drain directly to the water. There should be natural habitat at the back of the building, not a parking lot.
- Bright light, security lighting, and parking lot noise are just as hazardous pollution for wildlife, and are annoying to me, as a neighbor. My daughter’s bedroom window faces this parking lot. Light and noise are a feeding and mating disturbance for all wildlife, endangered and non-endangered.
- Further notes regarding noise:
 - **The EIR does not include future noise estimates for the proposed parking lot on the east side of the property, and how it may affect natural life in the creek and neighbors to the east of the creek.** It only includes noise from the Valle Verde street and potential impact on interior annoyance, and from construction process.
 - **According to HS-9.10** “The City shall encourage new development to maintain the ambient sound environment as much as possible. The City shall require new transportation-related noise sources that cause the ambient sound levels to exceed the compatibility 1 Kryter Karl D., The effects of Noise on Man, Second Edition, Academic Press, Inc. London, 1985, p.444-446. 10 standards in Table 8-1 to incorporate conditions or design modifications to reduce the potential increase in noise environment.
 - **According to HS-9.14** The City shall encourage new development to identify alternatives to the use of sound walls to attenuate noise impacts. Appropriate techniques include site planning such as **incorporating setbacks**, revisions to the architectural layout such as changing building orientation to provide noise attenuation for portions of outdoor yards, and construction modifications. In the event that sound walls are the only practicable alternative, such walls should be designed to be as visually pleasing as possible, incorporating landscaping, variations in color and patterns, and/ or changes in texture or building materials.

I have not seen suggested mitigations of parking lot runoff, light, and noise that are adequate to maintain the wildlife along Salvador creek.

2. Zerba Bridge Removal

I STRONGLY SUPPORT removing the Zerba bridge because it 1.) is unsafe, 2.) creates a flood hazard, and 3.) is an attractive nuisance and no longer has use for human nor vehicle traffic.

This EIR reporting on bridge removal does not include study on erosion and bridge stability. The bridge has rapidly increased erosion around the piers and appears unsafe. I live steps from this bridge and noticed a visible change in the bridge after the earthquake in 2014. The erosion around the decking and abutment to the bank has since also dramatically, rapidly visibly deteriorated in the past 2 winters’ storms (2017 and 2018). Changes in the water flow because of the building project and erosion control undoubtedly would affect the continued erosion of the bridge.

The report states that the bridge demolition would include “removal of the bridge decking, tops of piers, and an abutment above the top of the bank on the western side.” Appendix J then states, (pg3): “The

bridge deck and pier would be removed while the abutments would remain.” How much of the removal would actually occur? I request a more detailed survey of the bridge pier safety to determine if the piers also need to be removed; they may become unstable if just the decking is removed.

There is no longer human or vehicle use for this bridge. There is a foot bridge just north which connects the public trail to a public street. The Zerba bridge connects a weed-infested field (or potentially a parking lot) to a private drive. Bridges over streams naturally draw people to them, and this bridge would be inviting for residents to cross it, directly onto my private property.

Overall this bridge is not safe for cars nor humans, is getting worse each winter, stability will be exacerbated by the building project, there is no use for it, it is an attractive nuisance, and it should be removed. If not removed, there needs to be design consideration for an impassable barrier for car and human use of the bridge.

3. Systemic Neighborhood Safety Challenges + Environmental Challenges

These 2 issues are systemically linked, and it is a weakness of the EIR that they are not legally considered together. **I request a review of social impact on the environmental impacts of homeless behaviors in creek habitats.** Common behaviors of homeless along creek banks include littering, creating erosion from walking, living, and sleeping along creeks, litter from alcohol and drug paraphernalia, depositing human waste. Please note for reference the increase in homeless river encampments near the South Napa homeless shelter.

I stood up in a public meeting in 2018 to support the original Gasser proposal whereby homeless individuals, very low-income, or transitioning foster children would be housed in the remodeled Heritage building and live under supervision from the Adobe management. However, I now strongly oppose the shift to the *No Place Like Home* program which pair the following two elements, is not an acceptable recipe to protect our Salvador Creek habitat:

- Intentional tenant recruitment who have psychotic and violent, criminal tendencies
- No requirements of sobriety and engagement with support services

Beyond the “bait and switch” issue of the Gasser’s community communication style, **the detriments to the unique and fragile Salvador Creek habitat because of homeless activity should be studied and process and design mitigations included in the EIR.** These mitigations should influence such items as: removal of the *No Place Like Home* program from building operations, increase the protective design requirements of the building, reduction in allowable living density, landscaping and hardscaping considerations to block human access to the creek habitat, parking lot design, and/or other habitat protection measures.

IN CONCLUSION

1. **I STRONGLY OPPOSE** building a parking lot on the east side of the proposed building project, between the building and the creek. This unique riparian corridor should be preserved and protected to its fullest.
2. **I STRONGLY SUPPORT** removing the Zerba bridge for flooding, environmental, and safety considerations.

3. **I STRONGLY OPPOSE** the Napa County Board of Supervisors, Napa City Council, and the Gasser Foundation's plans to convert the abandoned Sunrise Assisted Living facility at the end of Valle Verde to become a residence for persons at high-risk of long term of intermittent homelessness **as defined by the *No Place Like Home Program* because it is a community safety hazard and an invitation to human interference and damage to the creek habitat.** I am not opposed to the residence plans as proposed by Gasser at the neighborhood meeting in 2017, as actively managed by Adobe with residents without psychotic and criminal tendencies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kara Harrington', with a long horizontal flourish extending to the right.

Kara Harrington
2125 Big Ranch Rd
Napa, Ca
94558