



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

September 4, 2019

Kathy Pease  
AICP, Contract Planner  
Planning Division, Development Department  
City of Napa  
P.O. Box 660  
Napa, California 94559

Subject: Draft Environmental Impact Report/Environmental Assessment for the Heritage House/Valle Verde Project, Napa County, California

Dear Ms. Pease:

The U.S. Environmental Protection Agency has reviewed the above-referenced document. Our review is pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The proposed project would receive assistance from the U.S. Department of Housing and Urban Development to provide affordable housing to low-income and homeless populations in the Napa area. The project would entail converting an existing assisted living facility into the Heritage House, which would include 66 single room occupancy units. It would also involve constructing the Valle Verde apartment complex, which would provide 24 multi-family units. Both facilities would be equipped with sustainable features, such as solar photovoltaic panels, energy and water-efficient appliances, and drought-resistant landscaping.

The EPA understands that there is a pressing need to provide affordable housing in California, particularly in the San Francisco Bay Area. We support the City's effort to address these needs in a manner that reduces certain environmental impacts; we have some concerns, however, about the potential floodplain issues associated with the project, particularly given that vulnerable populations would reside in the proposed housing complexes. According to the Draft EA, the project would be partially located within the 100-year floodplain of the adjacent Salvador Creek. Constructing the Valle Verde apartments would increase the area's base flood elevation by one foot (from 39.2 feet to 40.2 feet) (p. 134). The lowest point of the Valle Verde complex would be one foot above the BFE. A portion of the existing assisted living facility is below the BFE and would need to be elevated (p. 135).

In a changing climate, floods and droughts are likely to become more frequent and more intense as regional and seasonal precipitation patterns change and rainfall becomes more concentrated into heavy events. Preserving floodplains is vital for adapting to larger, more intense storms. We recommend that the Final EA discuss the feasibility of adjusting the project design to locate the Valle Verde complex as far away from flood hazard zones as possible to avoid encroaching on the floodplain. If such design modifications are determined to be infeasible, we recommend that the City consider elevating the structures further beyond the BFE and incorporate low-impact development features that reduce impervious surfaces to the fullest extent feasible.<sup>1</sup> Additionally, in order to improve public safety, we

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<sup>1</sup> For example, see EPA's online resource for permeable pavements, available at: <https://www.epa.gov/soakuptherain/soak-rain-permeable-pavement>

recommend that all access routes, including walkways, driveways, and roadways, be located in areas above the BFE and with evacuation routes leading directly out of the floodplain area. We also recommend that all essential equipment and infrastructure be located outside of the floodplain, and that no hazardous materials of any kind be stored in flood-prone basements.

The Draft EA states that the project may involve removing the Zerba Bridge as a condition of project approval to address some flood-related impacts. Removing the bridge could potentially affect a small amount of jurisdictional waters and thus require permits from the U.S. Army Corps of Engineers. It would also increase downstream BFE by 0.01-1 ft (p. 137). If the bridge removal alternative is selected, we recommend that the Final EA document coordination that has taken place between the City and USACE to ensure that the project complies with the conditions of any required permits (e.g., Clean Water Act Section 404). We also recommend including a more detailed discussion of downstream flood-related impacts resulting from the increase in BFE.

We appreciate the opportunity to review this Draft EA and are available to discuss our comments. Please send one electronic copy of the Final EA when it becomes available to this office at the address above (mail code TIP-2). If you have any questions, please contact Morgan Capilla, the lead reviewer for this project, at 415-972-3504 or [capilla.morgan@epa.gov](mailto:capilla.morgan@epa.gov).

Sincerely,



Connell Dunning, Acting Manager  
Environmental Review Branch

Electronic copy: Sahrye Cohen, U.S. Army Corps of Engineers