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Public Comments



YOCHA DEHE
CULTURAL RESOURCES

RECEIVED

JUL 05 2016

Napa County Planning, Building
& Environmental Services

June 30, 2016

Wyntress Balcher, Planner
Napa County
Planning, Building & Environmental Services
1195 Third Street, Suite 210
Napa, CA 94559

RE: Soscol Ferry Road Project

Dear Ms. Balcher:

Thank you for your project notification letter dated, June 17, 2016, regarding cultural information on or near the proposed Soscol Ferry Road project, Napa, Napa County, CA. We appreciate your effort to contact us and wish to respond.

The Cultural Resources Department has reviewed the project and concluded that it is within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we have a cultural interest and authority in the proposed project area.

Based on the information provided, the Tribe has concerns that the project could impact undiscovered archaeological deposits. We would like more information on your project. Please send us the following information:

- Approximate Date of Project
- Approximate depths the project would be excavating
- Mitigation measures
- Research Design component

Additionally, Yocha Dehe Wintun Nation requests a site visit to the project area to evaluate our cultural concerns.

Please contact the following individual to coordinate a date and time for the site visit.

Mr. James Sarmiento
Cultural Resources Manager
Yocha Dehe Wintun Nation
Office: (530) 723-0452, Email: jsarmiento@yochadehe-nsn.gov



YOCHA DEHE
CULTURAL RESOURCES

Please refer to identification number YD - 06242016-02 in any correspondences concerning this project.

Thank you for providing us with this notice and the opportunity to comment.

Sincerely,

James Kinter
Tribal Secretary
Tribal Historic Preservation Officer



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
700 Heinz Avenue
Berkeley, California 94710-2721



Edmund G. Brown Jr.
Governor

July 5, 2016

Ms. Wyntress Balcher
County of Napa
Planning, Building & Environmental Services
1195 Third Street, Suite 210
Napa, California 94558
Wyntress.balcher@countyofnapa.org

RECEIVED
JUL 08 2016
Napa County Planning, Building
& Environmental Services

NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT TRANSMITTAL AND INITIAL STUDY FOR NAPA VAULT STORAGE FACILITY USE PERMIT #P14-00296 AND TENTATIVE PARCEL MAP #P-15-00298, NAPA, CALIFORNIA

Dear Ms. Balcher:

Thank you for the opportunity to comment on the Notice of Completion & Environmental Document Transmittal with Initial Study Checklist for the Napa Vault Storage project. The California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a potential Resource Agency, DTSC is submitting comments to ensure that the environmental documentation prepared for this project pursuant to the California Environmental Quality Act (CEQA) adequately addresses any remediation activities which may be required to address any hazardous substances release on the project site.

The Notice of Completion and Initial Study Checklist do not include a thorough description of the property's historical uses. Without this information we are unable to determine whether hazardous substances may have been released into the soil at the project site. DTSC recommends that a historical assessment of past uses in the project site be conducted. Based on that information, sampling may need to be conducted to determine whether there is an issue which will need to be addressed in the CEQA compliance document. If hazardous substances have been released, they will need to be addressed as part of this project.

For example, if the remediation activities include the need for soil excavation, the CEQA document should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation activities, including dust levels

Ms. Wyntress Balcher
July 5, 2016
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and noise; (3) transportation impacts from the removal or remedial activities; and (4) risk of upset should be there an accident at the Site.

On March 1, 2005, DTSC, the State Water Resources Control Board (State Board), and the Regional Water Quality Control Boards (Regional Boards) signed a Memorandum of Agreement (MOA) aimed to avoid duplication of efforts and improve coordination among the agencies in their regulatory oversight of investigation and cleanup activities at brownfield sites. Brownfield sites are generally those that are contaminated and potentially contaminated where some type of development or redevelopment is planned.

Under the MOA, anyone requesting oversight from DTSC or a Regional Board must submit an application to initiate the process to assign the appropriate oversight agency. The completed application and site information may be submitted to either DTSC or Regional Board office in your geographical area. The Brownfields Coordinators in those agencies will contact the other agency or reply with the name and contact information for the selected oversight agency. Enclosed is the Request for Regulatory Oversight Application and site information form.

If you have any questions or comments, please contact me at (510) 540-3840 or remedios.sunga@dtsc.ca.gov.

Sincerely,



Remedios V. Sunga
Project Manager
Brownfields and Environmental Restoration Program

Enclosure

cc: without enclosure

Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

CEQA Tracking Center
Department of Toxic Substances Control
PO Box 806
Sacramento, California 95812-0806



State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
7329 Silverado Trail
Napa, CA 94558
(707) 944-5500
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



July 13, 2016

Ms. Wyntress Balcher
County of Napa
Conservation, Development and Planning Department
1195 Third Street, Room 210
Napa, CA 94559

Dear Ms. Balcher:

Subject: Napa Vault Storage Facility Use Permit #P14-00296 and Tentative Parcel Map #P15-00298, Initial Study/Mitigated Negative Declaration, SCH #2016062041, Napa County

The California Department of Fish and Wildlife (CDFW) has reviewed draft Mitigated Negative Declaration (MND) for the Napa Vault Storage Facility Use Permit and Tentative Parcel Map (Project). CDFW is providing comments on the draft MND as a Trustee Agency and Responsible Agency.

As Trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use by the people of California. CDFW also acts as a Responsible Agency pursuant to the (California Environmental Quality Act (CEQA) Section 15381 if a project requires discretionary approval, such as issuance of a California Endangered Species Act (CESA) Incidental Take Permit (ITP) (Fish and Game Code section 2080 *et seq.*), or Lake and Streambed Alteration Agreement (LSAA) (Fish and Game Code section 1600 *et seq.*). Pursuant to our jurisdiction, CDFW has the following concerns, comments, and recommendations regarding the proposed Project.

Project Location and Description

The 10.32-acre Project site is located at 1055 Soscol Ferry Road, in unincorporated Napa County, on the south side of Soscol Ferry Road, approximately 1,400 feet west of the intersection with Napa-Vallejo Highway. The Project proposes to construct 130 industrial storage units within 11 buildings, where 128 units are to be sold as individual condominiums.

Habitat Assessment

In order for CDFW to adequately assess the Project's potential impacts on biological resources, the draft MND should include an accurate assessment of existing biological conditions. For example, a biological survey was conducted in January 2014; however, it is not clear if protocol level plant surveys were performed. The MND states that background literature suggests a high number of sensitive plant occurrences within the project region; however, a single day botanical inventory survey performed in 2007 found no sensitive plant species.

Please note, the most current protocol level surveys conducted at the Project site and discussed in the MND (page 8) are over nine years old and may no longer be considered accurate. The MND should outline all special-status plant surveys that have been and will be performed according to current protocols to ensure that potential impacts are considered. CDFW-

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recommended survey and monitoring protocols are available on CDFW's website at: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html. Additional species-specific guidance may be obtained through CDFW's Bay Delta Regional office.

Swainson's Hawk

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code Sections protecting birds, their eggs and nests include 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Fully Protected Species may not be taken or possessed at any time (Fish and Game Code Section 3511). Migratory raptors are also protected under the federal Migratory Bird Treaty Act.

The Biological Resources section of the draft MND indicates potential impacts to habitat for Swainson's hawk (*Buteo swainsoni*), listed as a state threatened species. Swainson's hawk breeds in the western United States and Canada, and this species is adapted to forage in open grasslands and agricultural fields. Swainson's hawks often nest peripheral to riparian systems. They will also use lone trees in agricultural fields or pastures and roadside trees when available and adjacent to suitable foraging habitat. As important foraging and breeding areas are developed, the aptitude for the landscape to support breeding pairs decreases, and construction in close proximity to a known nest site may eventually lead to nest abandonment. Swainson's hawks are threatened due to loss of nesting and foraging habitat, and CDFW considers impacts to Swainson's hawk foraging habitat to be a potentially significant impact that should be mitigated. CDFW records show several documented Swainson's hawk nest sites within five miles of the Project area, where the nearest and most current occurrence is documented immediately adjacent to the Project site. Project implementation would therefore result in the permanent loss of nesting habitat and approximately 10 acres of foraging habitat for the hawk as well as for other raptor species.

Mitigation Measure IV.a.2

Mitigation Measure IV.a.2 is to mitigate for impacts due to the removal/disturbance of active raptor nests and requires a pre-construction breeding season survey and establish buffers to avoid impacts to nesting birds in consultation with CDFW. The MND should specify that protocol-level surveys for Swainson's hawk will be conducted during nesting season which is generally from March 1 until September 15. Swainson's hawk surveys should be conducted following the Swainson's hawk Technical Advisory Committee's *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (available at http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html). Surveys should be conducted within a minimum 0.25-mile radius of the proposed Project area, and should be completed for at least the two survey periods immediately prior to initiating any Project-related construction work. Raptor nests may be very difficult to locate during egg-laying or incubation, or chick brooding periods (late April to early June) if earlier surveys have not been conducted.

In order to avoid "take" or adverse impacts to Swainson's hawk in the event that an active nest is found during surveys, CDFW recommends avoiding all Project-related disturbance within a minimum of 0.25 miles (and up to 0.5 miles depending on site-specific conditions) of a nesting

Swainson's hawk during the nesting season. Please refer to the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks in the Central Valley of California (1994) regarding take avoidance, minimization and mitigation measures.

The draft MND includes a letter attachment dated August 28, 2015, which indicates an active Swainson's hawk nest on Soscol Creek immediately adjacent to the Project site. Due to the documented presence of a Swainson's hawk nest immediately adjacent to the project site, CDFW encourages protection of this nest and adjacent vegetation necessary to maintain the nesting habitat micro-climate. If the nesting habitat cannot be adequately protected, the MND should include an analysis of potentially significant impacts based on how many suitable nest trees are in the project footprint, how many of those trees would be avoided, and whether the Project will significantly alter existing nesting habitat conditions.

Mitigation Measure IV.a.1

To mitigate for impacts due to conversion of grassland habitat, Mitigation Measure IV.a.1 of the draft MND requires pre-construction nesting surveys and avoidance measures if project activities occur "typically February through August." The MND document should also include measures to avoid or minimize loss of Swainson's hawk foraging habitat that may result from implementation of the Project. Any permanent loss of Swainson's hawk foraging habitat should be appropriately mitigated due to ongoing and cumulative loss of this habitat type in the south Napa Valley area.

To mitigate for the loss of Swainson's hawk foraging habitat in a method consistent with the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (1994), CDFW recommends the MND update Mitigation Measure IV.a.1 to specify the following language:

- For projects within one-mile of an active nest tree (the Swainson's hawk Staff Report defines an active nest as used during one or more of the last five years), provide one-acre of land for each acre of development authorized (1:1 ratio).
- For projects within five miles of an active nest tree, but greater than one-mile from the nest tree, provide 0.75 acres of land for each acre of development authorized (0.75:1 ratio).
- For projects within 10 miles of an active nest tree, but greater than 5 miles from an active nest tree, provide 0.5 acres of land for each acre of development authorized (0.5:1 ratio).

Mitigation lands should be protected in perpetuity under a conservation easement, and include an endowment fund for long-term resource management for raptor habitat. CDFW is available to work with the applicant to develop a mitigation plan that reduces impacts to less-than-significant.

California Endangered Species Act

If "take" or adverse impacts to Swainson's hawk or any other species listed under CESA cannot be avoided either during Project activities or over the life of the Project, please be advised that a CESA permit must be obtained (pursuant to Fish and Game Code Section 2080 *et seq.*). Issuance of a CESA permit is subject to CEQA documentation; therefore, the CEQA document should specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the proposed Project will impact any CESA-listed species, early consultation is

Ms. Wynntress Balcher
July 13, 2016
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encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA permit. More information on the CESA permitting process can be found on the CDFW website at <https://www.wildlife.ca.gov/Conservation/CESA>.

Stream Resources and Aquatic Habitat

Soscol Creek is located immediately adjacent to the proposed Project site. Mitigation Measure IV.a.3 requires any work within the channel to be performed consistent with CDFW protocols. The MND should also address riparian impacts and specific measures to conclude that impacts have been mitigated to less-than-significant. Mitigation Measure IV.a.3 should be revised to address both permanent and temporary riparian impacts.

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, CDFW may require an LSAA, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. To obtain information about the LSAA notification process, please access our website at <https://www.wildlife.ca.gov/Conservation/LSA>; or to request a notification package, contact CDFW's Bay Delta Regional Office at (707) 944-5500.

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Due to the documented active Swainson's hawk nest on Soscol Creek immediately adjacent to the Project site, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

CDFW appreciates the opportunity to provide comments on the draft MND for the proposed Project. If you have any questions, please contact Ms. Suzanne Gilmore, Environmental Scientist, at (707) 944-5536; or Ms. Karen Weiss, Senior Environmental Scientist (Supervisory), at (707) 944-5525.

Sincerely,



Scott Wilson
Regional Manager
Bay Delta Region

cc: State Clearinghouse

CITIZEN COMMENT

TO

NAPA VAULT USE PERMIT MODIFICATION #P14-00296 AND TENTATIVE PARCEL MAP #P15-00298

July 18, 2016

These comments are in response to the Public Notice published June 17, 2016 by the Napa County Planning, Building, & Environmental Services Department.

My name is David Moreland, and I am the managing member of the 12+/- acre lot adjacent to the east of the proposed Napa Vault project. I am a resident of Napa County, and we (1111 Soscol Ferry Self Storage LLC) have owned and operated the property since 2010. I did contact Erik Bedford, the applicant for this project, in 2014, to discuss his plans but he failed to respond to my request. Only by receipt of the Public Notice and by being notified by my employees that someone from the adjacent lot had been in our office looking for his Crow call decoy did we have any knowledge of the project's status.

BACKGROUND: During the six years that we have owned Napa Storage & RV, we have seen significant change in the Soscol Ferry Road area (aka Soscol Ferry Zone). In particular, the traffic count has increased dramatically. The rezoning and permitting of the nearby Costco/ housing development has been approved, and the pressure on development in the Napa Valley Business Park (formerly Airport Industrial Area) has been astounding. During this time, the Soscol Ferry Zone has not experienced significant updates to services and infrastructure commensurate with the surrounding Business Park areas. Even though we are in the Airport sphere of influence, we are not in the Airport Development District. As such, we have not had the infrastructure deemed necessary by the county installed by the developers as the area has been built out. All of the owners of Soscol Ferry Zone are on wells (except Villa Romano Restaurant), and are on septic systems that are getting very old.

MODIFICATION OR REPLACEMENT OF EXISTING PERMIT: This proposal represents a very major modification for the existing use permit and should require the Planning Commission to look at the potential outcomes of a significantly different use of this land. Does not dividing the land into 129 individual legal lots that are generally less than 0.03 acres not require a different approach to the permitting of this project? Does Napa County have a procedure and approach to subdivisions and requirements for a master plan? I have spoken to Planning, Danielle Goshert at Public Works and Rick Marshall, the County Surveyor to try to understand the condominium model, and have concluded that the legal format is apparently not the main issue, but the usage and traffic is. Once this subdivision is done, built and sold, the county has a different set of issues with enforcement, modification and general upgrading than is usual with the current land ownership in the Soscol Zone. One of the conditions of approval is monitoring and reporting water usage. Would this not be better managed if the property was brought into the water district? These "condominiums" are grossly misrepresented as "mini-storage" as they will contain many small businesses and uses generally not allowed in ministorage projects. This is a light industrial development in the generally accepted uses of Napa County.

IS THIS TRULY MINISTORAGE? The developer/owners present their project as storage condominiums in the application for modification of the use permit, but their marketing materials focus on the following:

- A “wondrous place – full of tools and work spaces”
- “American dreamers started in their garage: Hewlett-Packard, Microsoft and Apple”
- “Contractors, inventors and rock bands have their roots in garages”

The developers clearly agree that their project is not ministorage: (our) “niche rests somewhere between the inadequacies of ministorage and... larger commercial industrial warehouse space”. As such, it is inappropriate to depend on ministorage data such as traffic projections in this project.

HOW DOES THIS PROJECT AFFECT THE FUTURE OF THE SOSCOL FERRY ZONE? The difficulty of providing basic services to Soscol Zone has led to a poorly executed development area. There is a restaurant with its septic field across Devlin road on a neighbor’s land. A “strip” light industrial project with its field covered with road construction debris, adequate firefighting water not extended the final 400 feet, etc. Deeded restrictions requiring upgrades to landscaping and required hookups to Napa Valley Sanitation (NVS) when available exist. In fact, this existing permit requires Napa Vault to join the NVS district if requested by the County. (Deeded Agreement dated March 3, 1992) The county clearly envisioned upgrading this area to eliminate ground contamination from septic tanks, and improved “Napa” appearance to future development. The only economic potential to accomplish this is for the Napa Vault project to bring sewage treatment to its future owners. An HOA of 130 will never do this in the future, and the cost belongs in the initial development. The sewer extension project has been preliminarily engineered and the plans are at NVS (Andrew Damron). Why would the county treat this small zone differently, when the opportunity presents itself? This road is a common entrance to the Meritage Resort, and the traffic count to Costco and the new Costco related development will be substantial.

SEWAGE: The NVBPSP & EIR in VII. Public Facilities Element, projects the Soscol Ferry Zone into the NMWS Service Area (P118). It also declares this area to be “difficult to sewer – development should be limited to low-intensity industrial uses”. A lot has changed since that statement, including preliminary engineering drawings detailing a direct line from the NSD to the subject property and on to the rest of the properties on Soscol Ferry Road. It is economically realistic at this time as the developer and the adjoining parcels will cost share it. After this development is completed, the new OA will probably not be onboard to share the cost, and the infrastructure within the development to realize the full potential of value to the future owners will be non-existent. Is this low-intensity industrial use?

WATER SERVICE: the same document labels extending the water service from the corner of Demptos further to the west to the front of this project. (Figure 19, p 122). The applicant has provided me with a copy of denial from the City of Napa PW stating that the property “is not contiguous to our existing water main” and is not in the “RUL and SOI”. By completing the loop back to the existing extension at Meritage, water circulation, and fire protection is significantly enhanced. As the developer volunteered to pay for this extension, should we not revisit the political will to enhance fire and safety?

NVBSP & EIR (NVBSP) CONFLICTS: NVBSP section V. Land Use Element, 3.a., Lot Size and Coverage states that a lot in excess of 5 acres can only be subdivided into minimum 5 acre lots, and “under special circumstances, such as a comprehensive development plan with highly unified site, architectural, landscape, and signage design approaches, discretionary exceptions can be considered by the PC.” Where are these elements? This project utilizes a practice that allows 130 separate owners and a resultant development that does not appear to be in the spirit of the Plan.

BIKE PATH PROJECTIONS: Based on prior conversations with Philip Sales, the Director of the Vine Trail Coalition, I believe that the Vine Trail is projected to proceed along Devlin from the South of Suscol Creek and then along Soscol Ferry toward the west. Vine Trail has told me they are negotiating with Cal Trans to identify a navigable path thru the Devlin/Soscol Ferry intersection, as well with NSD to route the path to the west of Devlin thru the pending golf course area. They have also expressed interest in taking the bike traffic off of Devlin north of Suscol Creek and traversing along the creek bank, south of our lots, toward Napa Sanitation District. They have verbal approval from the first two lots, with this project and the 5 acre lot to the immediate west remaining. This should be reviewed prior to permitting this project. This is primarily a safety issue, as well as the aesthetics of the bike path. The bike path does not appear to be on the Graphics package.

AGREEMENT FOR ANNEXATION INTO NVD DISTRICT: The existing recorded agreement attached to the property, dated March 3rd, 1992, states: “Whereas, although said property presently receives sewer service by means of a septic system situated upon the premises, the parties acknowledge that this and other properties in the area are experiencing and will continue to experience an increasing need for public water supply and sewage disposal services;” As evidenced by the County and PC in this agreement, it is appropriate that the County require that this document remain in force, and require that the Napa Vault project join the district and connect with sewer. If need be, we will petition the NVD for including us into the district. As stated earlier in this document, there are other property owners that are required to join the NVD when available, and this appears to be the only time where extension of and annexation to the Sanitation District may be feasible due to the potential issues with creating consensus amongst the 130 members of the proposed HOA. The existing

TRAFFIC STUDY: The application states that this proposal has been approached as a “mini storage” facility with 30% RV/Boat, 40% Car Collection and 30% Dead storage. As a “mini storage” site located adjacent to the proposed site, we have a significant percentage of our larger units rented to local businesses and contractors. These businesses often access their storage for materials 4 to 5 trips per day. As we do not allow electricity and “setting up shop” in our units, the probability of a carpenter, or other service provider setting up shop at Napa Vault is very high and would result in even more trips. Napa is a unique county with very restrictive zoning. During the past 3 years, we have received many requests for large units with electricity for local contractors and businesses. This will be the predominate buyer of the Napa Vault project. In addition, I question if the Planning Department requested projected traffic on Soscol Ferry. With the advent of Costco and its’ accompanying developments, the traffic will easily exceed the 7000 daily trips, thus lowering the threshold to 20 trips. All of the land owners on Soscol Ferry acknowledge that our traffic count has increased dramatically over the past two years.

FIRE PROTECTION: Based upon our experience in ministorage, these units will attract small businesses. We have several tenants that would gladly relocate to Napa Vault as it would better serve their business needs. They would store material, visit several times a day to organize their crews, pick up materials and otherwise operate their businesses. As we do not provide electricity to our units, and as we do not allow our tenants to utilize their storage units as either offices or workspaces, they do not spend a great deal of time on site. At Napa Vault, they will utilize the units as advertised by the developer. Set up a machine shop as pictured in their web materials, startup a new company, etc. Since the units will be individually owned, there is no landlord present to monitor and enforce the restrictions inherent to ministorage. We constantly have to make sure that our tenants are utilizing their property correctly. I also question that if an owner is going to be working in these units (be it on their car, machine tools, or wood working) would it not require sprinklers. I believe that the lack of sprinklers is only applicable to space where only “dead storage” is utilized. We are adjacent to Demptos, which has NMWS fire protection, as well as adjacent to the proposed development. Perhaps, the NMWS would be more amenable if I requested fire protection and then Napa Vault followed on.

CONDITIONS OF APPROVAL: The proposed “B. Conditions of Approval” specify in 2.2 PERSONAL STORAGE USE, that the use shall be limited to the storage of personal storage items and shall not be used for “commercial automotive repair, commercial sales, or any industrial or manufacturing activities”. My experience tells me that many, if not most, of these units will be used to support small business activity in Napa County, and as such the management of external appearance/storage, and the potential for working in units and other unacceptable use will be much greater. At our adjacent storage facility, we are constantly policing our tenants to ensure that they do not store combustibles or other unacceptable items. Should these conditions not be more stringent? And should we not have the opportunity to review and comment on CC&Rs prior to permitting this project?

REQUEST: That this Use Permit Modification be returned to Planning for review of the following:

- Traffic Study. Clarify use projections using existing “mini storage” and projections to 2020 to determine if a turn lane is not appropriate now.
- NVD. Request that Napa Vault enter into a Napa Valley Sanitation District, and that service be brought to Soscol Ferry road in order for balance of the Soscol Zone parcels may join in.
- Require that Napa Vault discuss options with Vine Trail and make available the option to relocate the bike trail away from the high traffic road to the south of the property. Vine Trail to assess its’ interest in this option.
- Ensure that all actions that can be taken to ensure that the Soscol Zone has the ability to develop to the best standards and practices in Napa County in the future.
- Have applicant provide proposed CC&R to allow comment and County input into use of condominiums.
- Fire protection of units to meet anticipated use requirements. Revisit availability of fire protection from the Napa Water system.

COMMENT: Let us not repeat many of the mistakes of the past. The citizens of Napa County have missed opportunities in the past. We didn’t keep the water from Lake Berryessa, we didn’t buy the rail

right of way when we could. We inherit agreements that don't provide for the future with respect to shared wells/water. With a look to the future, we can not only improve upon the appearance and utility of the Soscol Ferry Zone, we can reduce the pollution of our ground water with septic systems near Soscol Creek, and ensure that ALL available land within the NVBPSP is developed to the best quality and best utility possible. To my knowledge, the NVBPSP has not allowed a project similar to this one anywhere. Land is precious in the Napa Valley, and we have decided time after time to limit our non-agricultural growth to a few specific areas. Don't let a hurried review allow us to close the door to an obvious infrastructure upgrade (as declared previously by the County) for the zone.

BENEFIT TO DEVELOPER/BUYERS: By utilizing the Napa Sanitation District, the developer would be able to extend Buildings K and J closer to the street. The buyers will not have an OA responsible for the maintenance and reporting on the water system and septic system. The sprinkler and fire protection will be more dependable as supplied from street fire system. The value of the units (both utilitarian and monetary) will be increased to the potential purchaser as water and sewer will be available, and a better development would exist.

/s/

David Moreland

Managing Member

1111 Soscol Ferry Self Storage LLC



RECEIVED

JUL 19 2016

Napa County Planning, Building & Environmental Services

July 19, 2016
Wyntriss Balcher
Planning, Building, Environmental Services
1195 Third Street Suite 210
Napa, CA 94559

Chuck McMinn
Board President

Philip Sales
Executive Director

NAPA VALLEY VINE TRAIL COALITION
BOARD MEMBER ORGANIZATIONS

LAND INTEREST GROUPS

- Napa Valley Vintners (co-founder)
- Napa Valley Grapegrowers (co-founder)
- Land Trust of Napa County (co-founder)
- Napa County Farm Bureau
- Winegrowers of Napa County

PUBLIC AGENCIES

- Napa County Transportation & Planning Agency (NCTPA)
- City of Vallejo/Solano County NCTPA/TAC Public Works Planners
- Active Transportation Advisory Committees of Napa County (ATAC)
- Napa County Regional Park & Open Space District
- California Department of Fish & Game
- Napa County Planning Commission
- Napa County Law Enforcement
- Napa County Sheriff's Department
- City of Napa Police Department
- California Highway Patrol
- Napa Valley College
- Caltrans District 4

ECONOMIC INTEREST GROUPS

- Visit Napa Valley
- Napa Valley Chambers of Commerce
- NV Hispanic Chamber of Commerce
- Calistoga Vitality Group
- Cycling Businesses of Napa Valley
- North Bay Realtors/Napa Group

ENVIRONMENTAL INTEREST GROUPS

- Sierra Club Napa Group
- Sustainable Napa County
- Friends of the Napa River

CULTURAL & COMMUNITY INTEREST GROUPS

- Napa County Bicycle Coalition
- Health, Wellness & Medical Coalition
- Youth Development/Safety Education
- Safe Routes to School Napa County
- Runners of Napa Valley
- Rotary Clubs of Napa Valley
- Arts Council Napa Valley

Ref: Napa Vault P14—00296/P15-00298, APN: 057-170-018

Dear Ms. Balcher and members of the Planning Commission:

I appreciate the opportunity to comment on the Napa Vault project. My apologies for the last minute comments but it is important for the Vine Trail project.

The Vine Trail Coalition is seeking to find an alignment along Devlin Road and Soscol Ferry Road which will be safe and scenic for trail users. The existing alignment for the Vine Trail would be along the south side of Soscol Ferry Road between Devlin Road and the Sanitation District property entrance. This is the 10' wide multi-use path recommended by County Public Works in its memo dated September 15, 2015.

As you are aware, Caltrans and the Napa Valley Transportation Authority are proposing a flyover interchange at Soscol Avenue and SR 29 which will create a major change in the intersection of Devlin Road and Soscol Ferry Road. This could make the bike path along Soscol Ferry Road less desirable as it would connect to a busy intersection at Devlin Road.

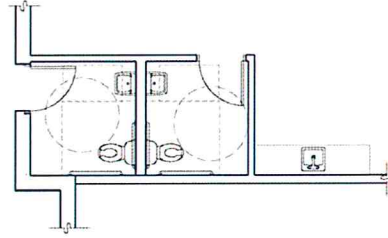
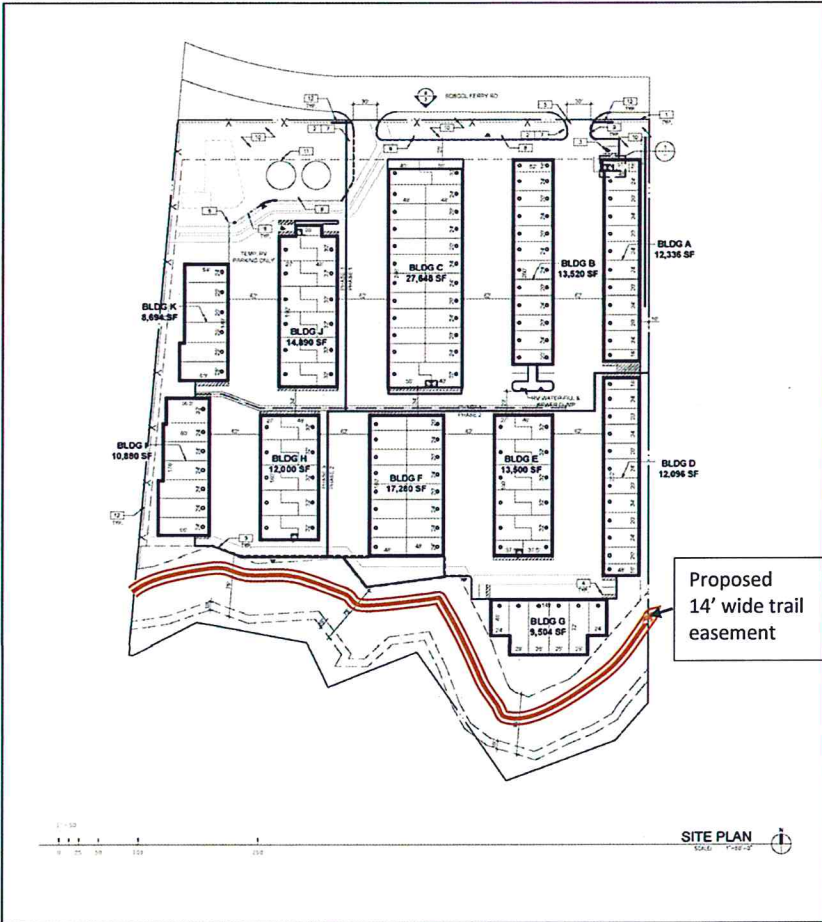
The Vine Trail Engineering Committee met with David Moreland, owner of Napa Storage adjacent to the Napa Vault project. He had suggested instead of constructing a 10' wide multi-use path in front of his property that the multi-use path be aligned behind his property along the north side of Suscol Creek within the 75' setback. This would work only if the adjacent property owners, Napa Vault would grant an easement for the trail on their property.

We are still evaluating other alternatives but we request that the proposed 75' creek setback include provision for a multi-use path at the back of the Napa Vault property per the attached sketch. 14' is the recommended width a 10' wide trail plus two 2' wide shoulders. This will keep this option open while we explore other alternatives.

Sincerely

Philip Sales, Executive Director

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



SITE PLAN NOTES
SEE SHEET 1057 FOR GENERAL NOTES

- 1. PROPERTY LINE, SEE CIVIL DRAWINGS (---)
- 2. UNIMPROVED WHEEL FURNISH SOIL
- 3. MIN. ACCESSORY PARKING SHALL BE 10% MIN.
- 4. PARKED PARKING SHALL BE PER CITY STANDARDS
- 5. NEW DRIVEWAYS, SEE CIVIL DRAWINGS
- 6. NEW DRIVEWAYS SHALL BE 20' WIDE
- 7. FENCING SHALL BE 6' HIGH
- 8. FENCE LINE, SEE CIVIL DRAWINGS
- 9. FIRE LINE SHALL BE 10' WIDE AND SHALL BE 10' FROM THE BUILDING
- 10. LANDSCAPE AND IRRIGATION AREA, SEE LANDSCAPE DRAWINGS
- 11. WATER STORAGE TANK, SEE CIVIL DRAWINGS
- 12. FUTURE TRAIL AND GATE, SEE CIVIL DRAWINGS

SITE LEGEND

- 1. TRANSITIONER WITH CONCRETE PAV. SEE ELECTRICAL DRAWINGS FOR POWER DISTRIBUTION AND GROUNDING PER LOCAL UTILITY OR PER C. AREA STANDARDS
- 2. FIRE LINE DITCHES
- 3. PARKING SHALL COMPLY WITH LOCAL STANDARDS
- 4. DRAIN LEVEL, FLOOR ROOM
- 5. FIRE HYDRANT (QUALITY LOCATION WITH CIVIL DRAWINGS)

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