The proposed Thomas Earl House project will have major negative impact on our neighborhood. This is not a proposal for a B&B. It is a proposal to create a small hotel and conference center. The owners will not reside there but will hire employees who will commute to work there. The project provides no affordable housing for those employees. This is not a step forward for Napa.

I have four primary concerns with this project:

- 1. Parking is a major issue near Calistoga and Seminary. That intersection has two existing B&B properties that add both staff and guest cars to the parking issues on the street. Blue Oak School, the Hotel Napa Valley operations on Calistoga Avenue, the new B&B at 1377 Calistoga Avenue, and the senior housing at Calistoga and Jefferson, all contribute to the street being constantly packed with vehicles. To add another major corporate tourist destination with its guest and employee vehicles is irresponsible.
- 2. Part of the charm of the Calistoga Avenue Historic District is the well-established landscaping, including several massive trees. The proposal to remove such trees from the Thomas Earl property would be a real loss and would impact the overall character of the neighborhood. These ancient trees are an integral part of the character of our neighborhood. Instead of lawns and gardens, this proposal requires new commercial buildings and a parking lot.
- 3. When we purchased our property in the Calistoga Avenue historic district, it was a residential street with one B&B, La Belle Epoque, on the corner. Since then new B&Bs have been created at their Suites next door, two houses with the Hotel Napa Valley, and one more at 1377 Calistoga Avenue, giving our street five commercial B&B operations in less than a block and a half. Adding a major corporate retreat to this mix will make the situation worse.
- 4. This is not a residential proposal. It is a commercial development. A corporate retreat will include catering and other evening activities on the property that are beyond the scope of a normal B&B. We already see tour buses stopping on our street to collect tourists for tours. Now we will see tour buses delivering and collecting corporate groups both night and day, as the groups visit wineries and restaurants during their stay. Calistoga Avenue will no longer be a residential neighborhood, it will now become a conference complex where we live. This is unacceptable.

Please require the owners of the Thomas Earl House to respect the remaining character of the Calistoga Avenue Historic District. By destroying the ancient tree and landscaping of the property, creating new traffic and parking issues, and hosting groups of visitors and events, this project is everything wrong with development in an historic area. Calistoga Avenue is a residential district, not a corporate conference and lodging center. Please allow us to maintain that character and deny this application.

Paul Wagner and Margaret Clark

Written, read aloud 05/21/2020

ATTACHMENT 13

Dear Planning Commissioners:

Rehabilitation Standards, allows a new use, still protecting and preserving the character, integrity and spatial relationships with the resource, site and environment. A project, including new construction, must assure the preservation of the resource, site and environment, conveying its historic character, value and importance, of the historic period, in a historic district. Additions are only allowed IF character defining features are not changed, destroyed, damaged or obscured.

The Evaluation report claims that the plans meet all historic standards; therefore, an EIR is, quote,"not necessary". Actually, none of the standards, are followed, except, possibly #7, no chemicals. Every aspect of these plans are inherently WRONG, offering no reverence or integrity!

A Categorical Exemption "loophole", #15301, not to allow an EIR, is not warranted. Relocating the resource and planning many adverse changes are not minor alterations.

#15303 might be better suited for commercial projects. Most residential alterations will be less than 10,000 sf. #15303 doesn't completely eliminate the obvious necessity, for an EIR or, equally important, a Cultural Landscape Report.

#15331 only exempts the CEQA, IF all efforts are done, quote, "in a manner, consistent with the standards". Since they aren't followed, this exemption attempt, must be reconsidered. In fact, a Categorical Exemption is NOT allowed to be used, on a project that causes a substantial, adverse effect, on the significance, of a historical resource!

These proposed changes constitute a substantial adverse impact, on the site and environment, by constructing an overbearing, unnecessary "Carriage House, and parking area, resulting in the removal of historic trees, etc. This, negative effect, of a "City Scape", is not compatible with the character and integrity, of a dominant, historical resource, in the historic district. It disrupts the spatial organization of the landscape's, cultural features, the circulation pattern of "traffic", an underground water resource, even small scale features. The California Department of Water resources involvement is necessary to use monitoring wells, to identify water changes in the area, for safety.

Napa's 2020 General Plan advocates an EIR, to ensure that environmental constraints are identified, avoiding adverse environmental impacts, for integration into the planning process, to protect natural resources and conserve ecosystems, coexisting in urban and natural settings. Napa's intent is to promote clean air, soil conservation and other desirable,"Urban Forest" benefits,. Napa's goal is to conserve the cherished past, of existing character, in established, charming, harmonious neighborhoods. More attention must consider historical settings and "sense of place", when planning development, in a historic district.

New construction must be compatible in size, scale, proportion, massing and character, not larger, than the original resource and not seen from public view. A six foot fence and Italian Cypress trees are not pedestrian friendly.

The Architectural Resources Group considered the plans confusing, identifying areas, which didn't follow historical standards, quote, "not warranted". Ignoring their recommendation, plans were not revised!

ATTACHMENT 13

The National Historic Preservation Act requires preparation of a NOA, Section106, for a Federal Agency to examine negative effects, on the integrity, of a historical property, allowing the Advisory Council, on Historic Preservation, an opportunity, to comment. More investigation is important!

June Beeler, written read aloud comment 05/21/2020 Dear Planning Commissioners:

Before making an important decision, on May 21st, about the proposal, for the Thomas Earl property, please consider all the adverse, negative effects, that will occur, if this plan is approved, in part, or in its entirety. Please, take the time, to read and reflect on all the valid aspects, that I explain, that you may not have, previously, considered? Your decision is, most likely, the most important one that you will ever have to make! My letter is long, to include factual information that you need to know, that can't be offered, in a three minute presentation.

The home has been loved and admired by many Napa residents and tourists, alike, since it was the most original, oldest home, in Napa. However, the public has not been informed about the extent, of the major changes, that will happen if the proposal is approved. Therefore, they have not spoken out against the transformation, of a historic property, into a private, modern business venue. Plus, at this moment, focus is on Covid 19.

After the 2014 Napa earthquake, contractors said that not all the concrete walls were damaged and did NOT need to be removed. Juliana Inman estimated that repairs to the home were, quote, "doable", for approximately \$500,000.

Unfortunately, all the concrete walls were quickly removed The historic home has been reduced to a shell, of its original grandeur, solely, in preparation of moving it forward, from its original footprint, which is not recommended, by the National Historic standards. More, major, adverse changes are scheduled, to happen. Again, none of the changes are recommended, for the rehabilitation, of a historic property. The Evaluation Report, prepared by notable designers and architects, falsely claims that all the standards are being followed. The report actually cites several other inaccurate statements, about the home.

An independent report, by the Architectural Resources Group, of San Francisco, reviewed the plans, determining that some areas were confusing as well as noting that three important areas did NOT follow the standards and were NOT warranted or recommended since, quote, "defining, historic characteristics, of the home, were altered." However, the plans were NOT revised!

In my opinion, all of the ten standards are ignored, dismissed or disguised. The most blantant ones are:

- 1. Moving the home forward from its original footprint
- 2. Making major, unwarranted, changes to the exterior, defining character, of the home
- 3, Constructing new structures that can be seen from public view, creating an adverse, negative effect, on the site and environment

Three overly large structures are planned to be built, on both sides of the home: two large "cottages", a two story, imposing building, just to provide six additional, large bedrooms, all over 400 square feet, or the size of a one bedroom home, along with an exercise room. The North side structures could, possibly, measure 80 feet, in length, diminishing the dominant, presence, of the original home, which measured, approximately, 52 feet, in length. The North boundary is 130 feet. Moving the house forward, from its original location, will attempt to disguise the immense size and length, of the new structures.

The Evaluation Report justifies the move by stating that the home will then be, quote, "centered on the property", over a large, new, underground basement as if that is an appropriate reason. The Thomas

Earl House was listed, on the National Historic Register, in 1992, with the home in its current, original location. Neither the large, underground basement nor the forward movement, of the home, should be allowed!

The applicant, who is a multimillionaire, claims that the reason, for the additional structures, is for the B & B to be an "economically viable" enterprise. In my opinion, the extra structures will be frequently occupied by extended family members, on vacations. I believe that the "business enterprise" is an clever idea, concocted to be more appealing, to City officials.

Other Napa B & B's manage to stay in business, offering much smaller, even less pleasant bedrooms. Allowing these large, additional structures, to be built, will definitely have an adverse, negative effect, on the commanding presence, of the historic home, on the site and on the environment, completely destroying the last, remaining legacy of Thomas Earl! Such major changes defies the National standards.

Originally, the home had five bedrooms, of adequate size, with enough light exposure. However, the plans enlarge those bedrooms, to about 400 square feet, each, too, thereby, reducing the number to four bedrooms, in the main home, changing or eliminating original 1861 window locations, also against National standards.

Another devastating effect is that in order to have space, on the lot, for these buildings and a parking area for 7-11 cars, in front of the historic home, all the existing, mature trees will be removed, with no concern, for the environment. Napa's General Plan advocates maintaining an "Urban Forest".

Also, a six foot high, vine covered fence and many, tall Italian Cypress trees will attempt to, quote, "hide" (or disguise) the cars and buildings, from public view, ensuring a private venue, on a property that was owned by a well-respected, public official, deserving the utmost integrity and reverence, for its history. Last year, the applicant spoke about the plans offering "reverence and Integrity". I disagree.

The design team's Evaluation Report states, quote, "all the ten standards are met". Therefore, the Environmental Impact Report, required by the California Environmental Quality Act, quote, "was not necessary" and not provided! I consider that reasoning as an inexcusable denial! The EIR needs to be required and completed!

The two, most important, mature trees are the impressive Grandiflora Magnolia and the magnificent American Elm which were planted by the Earl family, possibly over 150 years, ago. The Elm is a living testament, for its resistance, to the Dutch Elm disease, which kills many Elm trees. It needs to be studied by knowledgeable scientists. It has been described as the 'largest Elm, in Napa County''.

Also, the Elm is important for being the "hub", for all the trees, in the neighborhood. Mature trees serve a vital purpose, not only for their beauty, shade and home for wildlife; but, the oxygen they give off actually promotes a longer, human life span, providing cleaner air.

Besides absorbing ground water, into its root system, trees release water vapor, into the air, carrying along with it, small specks of dust, creating the cloud system. Water molecules form around the dust particles, becoming heavier, as visible clouds, eventually, falling to Earth, as rain, the life force, for every living thing. This natural fact is not even being considered; rain is a valuable gift. in future, drought years.

The root systems, of trees, have a symbiotic relationship, a hidden intelligence, with other trees, close by, transferring nitrogen, potassium and phosphorous, to maintain the health and vitality of those other trees. By removing the Magnolia and Elm trees, with their extensive root systems, what will the affect be on the protected Camphor tree, on Calistoga Avenue, or the Pine tree, across the street, or others?

The mature trees have served an additional, important purpose, for the environment, by absorbing great amounts of carbon emissions. for many years. Removing the trees, digging a pool and underground basement and constructing large buildings will release more amounts of carbon, into the atmosphere, not beneficial to climate change warnings. The buildings, cars and Italian Cypress trees will offer no carbon absorption, in comparison. Why aren't these facts considered relevant? Why isn't an EIR required???

The Elm is not at the "end of its life" as only one arborist claimed, without any study, of its core viability. His letter, to the City, states that the tree has, quote, "good vigor". This Spring, the Elm tree has sprouted abundant, new life, with the appearance of new, green leaves. Its sustaining "wellspring" is the underground water reservoir, throughout the neighborhood, and its spacious environment, for its extensive root system. Many of the older homes, in the neighborhood, are built high above the ground level because of this high water table. Even so, water collects, in their basements.

The high water table had not been taken into account, in the original plans, by the design team. Therefore, the City required engineering, to displace the water, in order for the basement and pool, to be developed. In my opinion, I repeat, the pool and basement portions, of the plan need to be denied. The cultural element of a well, providing water for the Earl family, continuing for 159 years, without running dry, is another standard that is being ignored.

Not only is the water removal system wasteful, of a valuable resource, in future, drought years; but, there could be unforeseen, dire consequences, to neighboring properties, whether it be from possible flooding or even sink holes, resulting in lawsuits, to the City. It does not seem wise to destroy or change Nature's finely tuned stability, of 159 years, no matter what system engineering experts have designed. Time will tell what could happen if the basement and pool are allowed...

Even though the Thomas Earl property was placed on the highest, top #1 level, of the Napa Landmarks listing, long ago, because it was the first concrete building, in Napa, requiring the utmost protection and preservation, the Landmarks group has been silent, offering no opposition to this plan, at all. I consider their silence disturbing...

Every aspect of this proposal is inherently WRONG and misguided as a shameful, exploitation, of a historic property! It would be better suited as a country estate. But, the size of the 1/3 acre and its proximity, to downtown Napa, was perceived as an enticing business opportunity rather than preserving its history.

Based on the flawed Evaluation Report, advocating the approval, of the plans, four Cultural Heritage Commissioners voted to issue a Certificate of Appropriateness, for the proposal. What a travesty! There were no questions about the absence of an EIR, no questions about the inaccurate claims of meeting the National standards, or why plans were not revised, after the AR group's review found unwarranted, exterior changes. There were no questions about the increased size of the buildings. or, even, their necessity. The few questions centered on building materials, for rehabilitation.. They listened to uninformed neighbors, saying that moving the house forward made it "compatible", to the other buildings!!! The CHC chairman, Mr Tuikke, agreed with that comment! In my opinion, it seemed as if the Commissioners had made up their minds, all ready.

Ironically, the next day, the City celebrated the placement of signs, identifying and promoting the Calistoga Historic District. But, the endearing, most important, historical focal point, in the District, the prominent, defining character, of the Thomas Earl home, a tribute, to the early days, of Napa's history, is in jeopardy of being erased, lost forever, if this entire plan receives the approval of this Planning Commission!

Instead, quote, "a City Scape", as described, in the Evaluation Report, will be substituted. Last year, this Commission thought the plan was, quote, "innovative". Why aren't historic places valued, any more, in particular, the Thomas Earl property????

Recently, Napa Landmarks issued their list of ten, threatened, historic places, in Napa County! The Thomas Earl property is the most threatened, of all, of them!

This letter presents many valid reasons to oppose the complete or certain portions, of the proposal, until more questions are answered. The decision, to approve the proposal, needs to be postponed, until an EIR and more investigation has been done, actively exploring alternatives that will be in the best interest, of the Thomas Earl property and the Calistoga Historic District, where it should be.

Anything less is WRONG! Anything less is a "black mark", on this Commission! Does anyone have the courage or moral conscience, to oppose this plan?

Sincerely,

June Beeler Formal written comment submitted to Planning Commission 05/21/2020