

Cahill, Christopher

From: Ben_Solvesky@fws.gov
Sent: Tuesday, September 01, 2009 12:35 PM
To: Cahill, Christopher
Subject: Napa Commerce Center Planning Permit Application and Initial Study Request for Comments
Attachments: 2008-1349 Greenwood Commerce Center Project. Napa County.pdf

Mr. Chris Hill,

This email is in regards to the Napa County Conservation and Development and Planning Permit Application and Initial Study Request for Comments on the Proposed Napa Commerce Center Project. We, the U.S. Fish and Wildlife Service (Service), received your request for comments on August 12, 2009. On April 16, 2009, the Service mailed a letter to Ms. Sarah Lynch regarding the potential presence or absence of several listed species at the proposed "Greenwood Commerce Center" project site. Although our letter to Ms. Lynch refers to the site as the "Greenwood Commerce Center", based on our review of the information contained in the Permit Application and Initial Study Request for the Napa Commerce Center, we have determined that both project names refer to the same project site. As such, our comments to Ms. Lynch regarding the potential presence or absence of listed species at the proposed Greenwood Commerce Center remain valid and represent the Service's comments on the proposed site.

If you have any questions regarding this email, please feel free to contact me.

Thank you,

Ben

Ben Solvesky
Fish and Wildlife Biologist
Sacramento Fish and Wildlife Office
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600
ben_solvesky@fws.gov

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09/02/2009



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846



In Reply Refer To:
81420-2008-TA-1349

APR 16 2009

Ms. Sarah Lynch
Associate Biologist
Monk & Associates, Inc.
1136 Saranap Ave., Suite Q
Walnut Creek, California 94595

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Subject: Technical Assistance for the proposed Greenwood Commerce Center project site, Napa County, California

Dear Ms. Lynch:

This is in response to your April 14, 2008 request for technical assistance from the U.S. Fish and Wildlife Service (Service) on the proposed Greenwood Commerce Center project site, located approximately 2.5 miles north of the City of American Canyon, in Napa County, California. Your request was received by the Service on April 15, 2008. At issue are the presence or absence of the threatened California red-legged frog (*Rana aurora draytonii*) (red-legged frog) and vernal pool fairy shrimp (*Branchinecta lynchi*) (fairy shrimp). In addition, the Service is concerned about the endangered showy Indian clover (*Trifolium amoenum*) and Contra Costa goldfields (*Lasthenia conjugens*) at the project site. This response is provided under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (Act).

Our comments and recommendations on the status of the red-legged frog, fairy shrimp, showy Indian clover, and Contra Costa goldfields are based on: (1) a March 18, 2009, site visit attended by the Service and yourself; (2) *California Red-legged Frog Site Assessment for Greenwood Commerce Center* dated April 14, 2008; (3) *Vernal Pool Crustacean Site Assessment for Greenwood Commerce Center* dated April 14, 2008; and (4) other information available to the Service.

Our comments and recommendations on the California red-legged frog, vernal pool fairy shrimp, showy Indian clover, and Contra Costa goldfields are as follows:

California red-legged frog

The California red-legged frog is the largest native frog in the western United States. Adult red-legged frogs typically use dense, shrubby, or emergent riparian vegetation closely associated with

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deep (>2.3 feet), still, or slow-moving water (Hayes and Jennings 1988). However, individuals also have been found in ephemeral creeks and drainages and in ponds that may or may not have riparian vegetation. This species disperses upstream and downstream of their breeding habitat to forage and seek sheltering habitat. Habitats include nearly any area within 1-2 miles of a breeding site that stays moist and cool throughout the summer (Fellers 2005). Potential sheltering habitat for California red-legged frogs is all aquatic, riparian, and upland areas within the range of the species and includes any landscape features that provide cover, such as existing animal burrows, boulders or rocks, organic debris such as downed trees or logs, and industrial debris. California red-legged frogs have been documented using a variety of upland habitats as well as riparian corridors for migration. They have been recorded migrating overland in approximately straight lines without apparent regard to vegetation type or topography. A study in northern Santa Cruz County found that the animals traveled distances from 0.25 miles to more than 2 miles without apparent regard to topography, vegetation type, or riparian corridors (Bulger *et al.* 2003).

The proposed project site contains open grassy upland areas, an ephemeral drainage, and grassy ephemeral wet swales, suitable to red-legged frogs, including countless animal burrows capable of providing sheltering habitat for the frog during parts of the year when pools are not inundated. The site is also 2.1 miles downstream and within dispersal distance of California red-legged frog proposed Critical Habitat Unit SOL-2 and 2.3 miles downstream of California red-legged frog proposed Critical Habitat Unit SOL-3 (CNDDDB 2009). There are no physical barriers that would prevent dispersing red-legged frogs from utilizing the project site. According to National Wetland Inventory maps, there is a perennial freshwater pond less than 300 feet from project site. This pond contains emergent vegetation, and provides potential breeding habitat for red-legged frogs.

According to the *Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog*, dated August 2005, "Because CRF are known to use aquatic, riparian, and upland habitat, they may be present in any of these habitat types, depending on the time of year, on any given property. For sites with no suitable aquatic breeding habitat, but where suitable upland dispersal habitat exists, it is difficult to support a negative finding with the results of any survey guidance."

Vernal pool fairy shrimp

Vernal pool fairy shrimp can inhabit alkaline pools, ephemeral drainages, rock outcrop pools, vernal pools, and vernal swales (Eriksen and Belk 1999; Helm 1998). Occupied habitats range in size from rock outcrop pools as small as one square yard to large vernal pools up to 12 acres with ponding depths ranging from 1.2 inches to 48 inches. Water movement between within complexes allows vernal pool fairy shrimp to move between individual pools. These movement patterns, as well as genetic evidence, indicate that vernal pool fairy shrimp populations exist within and are defined by entire vernal pool complexes, rather than individual pools. Adult vernal pool fairy shrimp have been observed in pools and seasonal wetlands from early

December to early May. The primary historic dispersal method for vernal pool fairy shrimp was likely large scale flooding resulting from winter and spring rains which allowed colonization of different individual vernal pools and vernal pool complexes. An important adaptation is that the vernal pool fairy shrimp has a relatively short life span, allowing it to hatch, mature to adulthood, and reproduce during the short time period when pools contain water. It can reach sexual maturity in as few as 18 days and can complete its lifecycle in as little as 9 weeks. In addition, soils in vernal pool fairy shrimp habitats may contain viable cysts from several years of breeding. The project site contains an ephemeral drainage and grassy ephemeral wet swales suitable to providing habitat for the vernal pool fairy shrimp. Adjacent to the project site (upstream) are larger and more numerous ephemeral pools. The nearest vernal pool fairy shrimp occurrence is located within 1.2 miles of the proposed project site at the Napa County Airport. Due to the close proximity of known occurrences and the presence of suitable habitat on site, it is possible this species may inhabit this site.

Showy Indian clover

Showy Indian clover was extirpated from all of its 24 historically known locations, which occurred in seven counties. Originally, it ranged from Mendocino County south to Sonoma, Marin, Alameda and Santa Clara counties, and east to Napa and Solano counties. The species was found in a variety of habitats including low, wet swales, grasslands and grassy hillsides. It typically grows in moist, heavy soils below 328 feet elevation. This listed plant has been documented to occur 2.5 miles west and 2.8 miles south of the project site. Due to the presence of suitable wet swales and grasslands on site, an elevation below 328 feet, and documented occurrences of this species near the project site, it is possible seeds of this species may be present within the seed bank and this species may occur on site.

Contra Costa Goldfields

Contra Costa goldfields grow in vernal pools, within open grassy areas in woodlands, and valley grasslands from sea level to 1,500 feet. Currently, 22 populations are believed to be extant in Mendocino, Napa, Marin, Contra Costa, Alameda, Solano and Monterey counties. This listed plant was documented less than 1.5 miles north of the project site in 2005. An additional occurrence has been documented 3 miles north of the project site. Due to the presence of valley grasslands on site and recent nearby occurrences, it is possible this species may occur on site.

By this letter, we give you our approval to implement a protocol survey for the California red-legged frog and vernal pool fairy shrimp at the proposed Greenwood Commerce Center Project Site. However, given the location of the site and habitats currently present at this location, the surrounding habitat, the ability of California red-legged frogs to utilize a variety of habitats, as well as its biology and ecology, we recommend that the presence of this listed amphibian be assumed at the project site. We caution that given our current understanding of the red-legged frog and fairy shrimp, as well as the conditions at the project site, negative results may not be accepted by the Service. In addition we also recommend surveys be conducted for rare plants in



Ms. Sarah Lynch

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accordance with the standardized guidelines issued by the regulatory agencies (U.S. Fish and Wildlife Service 1996, California Department of Fish and Game 2000) and the California Native Plant Society (2001).

If you have any questions regarding our response on the proposed Greenwood Commerce Center Project Site, please contact Ben Solvesky or Ryan Olah of my staff at the letterhead address, telephone (916) 414-6600, or electronic mail at Ben_Solvesky@fws.gov or Ryan_Olah@fws.gov.

Sincerely,


 Cay C. Goude
Acting Field Supervisor

cc:

Scott Wilson, and Liam Davis, California Department of Fish and Game, Yountville, California

Literature Cited

- Ahl, J. S. B. 1991. Factors affecting contributions of the tadpole shrimp, *Lepidurus packardii*, to its overwintering egg reserves. *Hydrobiologia* 212:137-143.
- Bulger, J. B., N. J. Scott, Jr., and R. B. Seymour. 2003. Terrestrial activity and conservation of adult California red-legged frogs *Rana aurora draytonii* in coastal forests and grasslands. *Biological Conservation* 110:85-95.
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U. S. Fish and Wildlife Service. 2005. Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog. Sacramento Fish and Wildlife Service Office. Sacramento, California.

_____ 1996. Guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants. Sacramento, California. 2 pp.



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
Post Office Box 47
Yountville, California 94599
(707) 944-5500
<http://www.dfg.ca.gov>

ARNOLD SCHWARZENEGGER, Governor
DONALD KOCH, Director



August 18, 2009

Mr. Chris Cahill
Napa County
Conservation, Development and Planning
1195 Third Street, Suite 210
Napa, CA 94559
Ccahill@co.napa.ca.us

Dear Mr. Cahill:

Subject: Napa Commerce Center, P09-00329 and P09-00330, Napa County

The Department of Fish and Game (DFG) has reviewed the documents provided for the subject project, and we have the following comments.

Please be advised that a California Endangered Species Act (CESA) Permit must be obtained if the project has the potential to result in take of species of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA Permit is subject to the California Environmental Quality Act (CEQA) documentation; therefore, the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA Permit.

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, DFG may require a Lake and Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of an LSAA is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the LSAA notification process, please access our website at <http://www.dfg.ca.gov/habcon/1600/>; or to request a notification package, contact the Lake and Streambed Alteration Program at (707) 944-5520.

If you have any questions, please contact Mr. Greg Martinelli, Water Conservation Supervisor, at (707) 944-5570.

Sincerely,

Charles Armor
Regional Manager
Bay Delta Region

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RWQCB Comments 8.19.09

From: Fred Hetzel [FHetzel@waterboards.ca.gov]
Sent: Wednesday, August 19, 2009 10:33 AM
To: Cahill, Christopher
Cc: Bill Hurley
Subject: Napa Commerce Center (APN 057-210-056) Permit Application
and Initial Study Request for Comments

Hi Chris,

In the application submitted to the County by Napa 34 Holdings LLC, the applicant requests a waiver from the Napa County Post Construction Run-off Management Requirements. The applicant states that the combination of limited space, unfavorable soil conditions for infiltration and shallow groundwater support the waiver. However, the development abutting this proposed project to the west has the same limitations, but is designed to meet the County's requirements on controls of post development run-off volumes. This project should therefore also be able to meet the County's post construction run-off control requirements.

Thank you for the opportunity to comment.
Fred

Fred Hetzel
SFB-RWQCB
1515 Clay St., Suite 1400
Oakland, CA 94612
phone 510-622-2357
FAX: 510-622-2460
e-mail fhetzel@waterboards.ca.gov

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 622-5491
FAX (510) 286-5559
TTY 711



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March 3, 2010

NAP029865
NAP-29-3.93

Mr. Chris Cahill
Conservation Development and Planning Department
County of Napa
1195 Third Street, Suite 210
Napa, CA 94559

Dear Mr. Cahill:

**NAPA GREENWOOD COMMERCE CENTER PROJECT – TRAFFIC IMPACT STUDY
(TIS)**

Thank you for continuing to include the California Department of Transportation (Department) in the early stages of the environmental review process for the Napa Greenwood Commerce Center project. The following comments are based on the TIS. Our previous comments still apply and are incorporated here by reference.

1. Please provide AM and PM Peak Hour turning movement volumes for each study intersection under Project Only Conditions, 2030 Cumulative Conditions Only, and 2030 Cumulative Plus Project Conditions.
2. The project must include extending the existing northbound (NB) left turn lane at the state route (SR) 29/Airport Boulevard intersection in order to accommodate the Plus Project queue. Please be reminded that a left turn lane requires both storage and deceleration length. For design specifications, please refer to the Department's Highway Design Manual, Index 405.2

Please feel free to call or email Sandra Finegan of my staff at (510) 622-1644 or sandra_finegan@dot.ca.gov with any questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Lisa Carboni".

LISA CARBONI
District Branch Chief
Local Development – Intergovernmental Review

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DEPARTMENT OF TRANSPORTATION

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September 29, 2009

NAP029865
NAP-29-3.93

Mr. Chris Cahill
Conservation Development and Planning
County of Napa
1195 Third Street, Suite 210
Napa, CA 94559

Dear Mr. Cahill:

NAPA GREENWOOD COMMERCE CENTER PROJECT - REFERRAL P09-00329

Thank you for including the California Department of Transportation (Department) in the early stages of the environmental review process for the Napa Greenwood Commerce Center project. The following comments are based on the project referral; additional comments may be forthcoming pending final review. As the lead agency, the County of Napa is responsible for all project mitigation, including any needed improvements to state highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Required roadway improvements should be completed prior to issuance of the Certificate of Occupancy. Since an encroachment permit is required for work in the state right of way (ROW), and the Department will not issue a permit until our concerns are adequately addressed, we strongly recommend that the County work with both the applicant and the Department to ensure that our concerns are resolved during the environmental review process, and in any case prior to submittal of a permit application. Further comments will be provided during the encroachment permit process; see the end of this letter for more information regarding encroachment permits.

Maintenance Services

1. Please address the additional truck traffic generated by this proposed project and its impact on State Route (SR) 29 maintenance due to wear and tear on the roadbed versus impacts of small truck and automobile traffic.
2. The project is located on a conventional highway. Any landscape improvements along SR 29 will be the responsibility of the local agency. The County of Napa will need to enter into a maintenance agreement with the Department.
3. We recommend that California Redwood/Sequoia sempervirens not be planted. Redwood tree roots, seeking moisture, can create havoc on underground utility lines.

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on state roadways, such as State Route (SR) 29, requires a transportation permit that is issued by the Department. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to the address below.

Office of Transportation Permits
California DOT Headquarters
P.O. Box 942874
Sacramento, CA 94274-0001

See the following website link for more information: <http://www.dot.ca.gov/hq/traffops/permits/>.

Cultural Resources

The project environmental document must include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within state ROW. Current record searches must be no more than five years old. The Department requires the records search, and if warranted, a cultural resource study by a qualified, professional archaeologist, to ensure compliance with CEQA, Section 5024.5 of the California Public Resources Code and Volume 2 of the Department's Standard Environmental Reference (<http://ser.dot.ca.gov>). These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in state ROW; these requirements also apply to NEPA documents when there is a federal action on a project. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to state ROW.

Storm Water

All discharges, construction as well as permanent runoff, originating from within the project's limits, entering into the state ROW must comply with the Department's statewide National Pollutant Discharge System (NPDES) permit. In order to ensure water quality standards are being met prior to discharge into the state ROW, the project also needs to be compliant with the County of Napa's NPDES permit. Please forward documentation that demonstrates the project will meet compliance criteria for both the Department and the County's NPDES permit.

If permanent treatment Best Management Practices (BMPs) will be used to ensure storm water runoff meets applicable standards, list which BMPs will be used and in what capacity. Please provide documentation, specifications, and any other pertinent material describing any applicable BMPs.

Traffic Impact Study (TIS)

Please include the information detailed below in the TIS to ensure that project-related impacts to state roadway facilities are thoroughly assessed. We encourage the County to coordinate preparation of the study with our office, and we would appreciate the opportunity to review the scope of work. The Department's "*Guide for the Preparation of Traffic Impact Studies*" should be reviewed prior to initiating any traffic analysis for the project; it is available at the following website: <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

The TIS should include:

1. Site plan clearly showing project access in relation to nearby state roadways. Ingress and egress for all project components should be clearly identified. State ROW should be clearly identified. Please include a vicinity map.
2. Project-related trip generation, distribution, and assignment. The assumptions and methodologies used to develop this information should be detailed in the study, and should be supported with appropriate documentation.
3. Average Daily Traffic, AM and PM peak hour volumes and levels of service (LOS) on all significantly affected roadways, including crossroads and controlled intersections for existing, existing plus project, cumulative and cumulative plus project scenarios. Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect study area roadways and intersections. *The analysis should clearly identify the project's contribution to area traffic and degradation to existing and cumulative levels of service. Lastly, the Department's LOS threshold, which is the transition between LOS C and D, and is explained in detail in the Guide for Traffic Studies, should be applied to all state facilities.*
4. Scheduling of other development projects and roadway improvements in the project study area, as well as the timing for all phases of the project, should be clearly identified for all study scenarios. This information should be included in both the TIS and environmental document in order to clearly establish project baseline conditions. Please include a list of cumulative development projects, including estimated completion dates and trip generation for each project.
5. Schematic illustration of traffic conditions including the project site and study area roadways, trip distribution percentages and volumes as well as intersection geometrics, i.e., lane configurations, for the scenarios described above.
6. The project site building potential as identified in the General Plan. The project's consistency with both the Circulation Element of the General Plan and the Napa County Transportation Planning Agency's Congestion Management Plan should be evaluated.
7. *Mitigation should be identified for any roadway mainline section or intersection with insufficient capacity to maintain an acceptable LOS with the addition of project-related and/or cumulative traffic.* The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should also be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that work that encroaches onto the State ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans, clearly indicating State ROW, must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures will be incorporated into the construction plans during

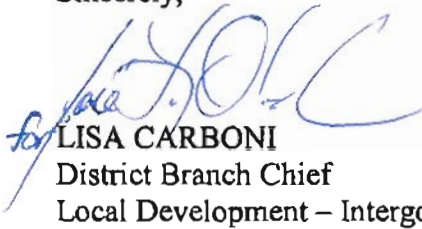
the encroachment permit process. See the following website link for more information:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Please forward copies of the environmental document and the TIS to the address below as soon as they are available:

Sandra Finegan, Associate Transportation Planner
Community Planning Office, Mail Station 10D
California DOT, District 4
P.O. Box 23660
Oakland, CA 94623-0660

Please feel free to call or email Sandra Finegan of my staff at (510) 622-1644 or sandra_finegan@dot.ca.gov with any questions regarding this letter.

Sincerely,


LISA CARBONI
District Branch Chief
Local Development – Intergovernmental Review