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Memorandum

date September 22, 2006

to Napa County Conservation, Development, and Planning Department:
Mary Doyle
Brian Bordona

from Vick Germany, Peter Hudson, and Kelly White

subject Response to Comments on Initial Study/Mitigated Negative Declaration
Napa Canyon LLC Vineyard - #02253 Erosion Control Plan

Introduction

This document provides the County's responses to comments received on the Initial Study/Mitigated Negative Declaration, dated December 2004 (2004 IS/MND) (ESA, 2004) and Technical Appendix: Geology and Hydrology (ESA, 2004) for the Napa Canyon LLC Vineyard #02253 – Erosion Control Plan Agriculture (#02253-ECPA) project.

In accordance with Section 15073 of the CEQA Guidelines, Napa County submitted the 2004 IS/MND to the State Clearinghouse for a 30-day public review period starting on December 20, 2004. The public review period ended January 18, 2005. During the public review period, Napa County received a total of eight comment letters on the 2004 IS/MND:

- Letter from United States Army Corps of Engineers (Corps) dated December 27, 2004 [Letter A]
- Letter from Napa County Resource Conservation District (RCD) dated January 3, 2004 [Letter B]¹
- Letter from City of American Canyon dated January 14, 2005 [Letter C]
- Letter from Dennis Jackson dated January 15, 2005 [Letter D]
- Letter transmittal of Attachments and Exhibits by Thomas Lippe dated January 17, 2005 [Letter E]
- Letter from Thomas Lippe dated January 18, 2005 [Letter F]
- Notice from State Clearinghouse dated January 18, 2005 [Letter G]
- Letter from Marc P. Hayes dated January 18, 2005 [Letter H]

No additional comments have been received since close of the comment period on January 18, 2005. This memorandum presents responses to comments on the comment letters received regarding the 2004 IS/MND. Annotated copies of the comment letters are provided as attachments to this memorandum.

¹ It should be noted that the date on Letter B is January 3, 2004; however, this is a typo and should read January 3, 2005.

Letter A – Corps, dated December 27, 2004

Response to Comment A-1

Comment acknowledged. Page 2-8 of the 2004 IS/MND acknowledges that a permit from the Corps may be required.

Response to Comment A-2

Comment acknowledged. Page 2-8 of the 2004 IS/MND acknowledges that a permit from the Corps may be required.

Letter B – Napa County RCD, dated January 3, 2004

Response to Comment B-1

Comment noted for future reference. This comment does not change the impact analysis because the comment merely points out that the black tail deer, not the mule deer, is the local species. The black tail deer is a common species and not considered rare or threatened; therefore, the 2004 IS/MND will not be revised to incorporate this comment.

Response to Comment B-2

As required by Measure HWQ-6, the project applicant, with concurrence from the project engineer and representatives of the Napa County RCD, is required to identify areas where excessive slope length and gradient may result in unmanageable and localized concentration of stormwater flow and develop a feasible mid-slope flow dissipation strategy for long slopes susceptible to erosion. At the time of this writing, drain tiles (“French drains”) is the flow dissipation strategy incorporated into #02253-ECP for slope length reduction, as recommended by Napa County RCD. Therefore, structures and mechanisms that would be employed to prevent soil erosion would require pre-approval by the Napa County RCD.

The Project Revision Statement, signed by the project applicant on June 5, 2005, includes changes that must be incorporated into the project description prior to project approval. Measure HWQ-6 is included in the Project Revision Statement as Provision No. 12. As noted in the above paragraph, drain tiles across long slopes is the dissipation strategy that will be implemented to meet the requirements of Provision No. 12. The provisions of the Project Revision Statement are analogous to Conditions of Approval.

Response to Comment B-3

The commenter’s concurrence with the general conclusions regarding soil loss and sediment delivery is acknowledged. It is also acknowledged that Napa County RCD prefers to analyze soil loss and evaluate ECP effectiveness using the Universal Soil Loss Equation (USLE) rather than the Revised Universal Soil Loss Equation (RUSLE). Therefore, based on the commenter’s comment, and to retain consistency with Napa County erosion control standards, ESA analyzed the pre- and post-project soil loss from the project site using the USLE. The analysis of the sediment yield and soil loss by USLE shows an overall decrease in soil loss when compared to the results of the RUSLE soil loss quantities (see page 3-18 of the 2004 IS/MND). However, these results do not alter the findings or conclusions reached in the 2004 IS/MND. The USLE methodologies and assumptions are discussed below.