Gallo / Stagecoach North EIR Key Passages

Where to send your letter
Public review period closes March 29, 2021. If comments are emailed, please include the project title in the subject line, attach comments in MS Word format, and include a return mailing address.

Written comments should be mailed or emailed to:

Donald Barrella (Donald.Barrella@countyofnapa.org)
Napa County Department of Planning, Building and Environmental Services
1195 Third Street, Suite 210, Napa, CA 94559

ES.3 SUMMARY OF THE PROPOSED PROJECT
[pp 16] This draft EIR is a public information document that objectively assesses and discloses the potential environmental impacts of the proposed project. This Draft EIR identifies feasible mitigation measures and alternatives that would avoid those impacts or reduce them to a less-than-significant level. *The claim of objectivity is completely unsubstantiated*

The project proposes vegetation removal and earthmoving activities on slopes greater than 5% in connection with development of approximately 91.3 net acres of new vineyard within an approximately 116.2-acre cleared (or development) area on the 170.2-acre project site.

Proposed vineyard development activities include removal of brush and trees within the proposed clearing limits, ripping, rock removal, blasting, soil cultivation, seeding of a cover crop, mulching, trenching for storm drain and irrigation pipelines, installation of a trellis system and deer fence, and layout of vine rows. Temporary and permanent erosion control measures would be installed.

Vineyard development would take place between April 1 and September 15, 2021, in one phase.

1.3 SCOPE OF THIS ENVIRONMENTAL IMPACT REPORT [pp37]

Air Quality and Greenhouse Gas Emissions
Biological Resources
Cultural and Tribal Cultural Resources
Geology and Soils
Hazards and Hazardous Materials
Hydrology and Water Quality
Land Use and Planning
Noise
Cumulative Impacts

This report does not assess wildfire, because it was determined to result in either no impact or a less-than-significant impact. Here is the reasoning:

> Wildfire: Project construction and operation would not require any road closures, and existing roads would continue to provide adequate emergency access to the project site and project area. The proposed project would not impair an adopted emergency plan or emergency evacuation plan. Project construction would require the presence of some vehicles and heavy equipment that could spark and ignite flammable vegetation. During construction, the risk of igniting a fire would be low because vegetation would be cleared before development of the vineyard, and the risk would be temporary because of the short duration of construction (approximately 5½ months). Operations and maintenance activities would be similar to activities already occurring in the project area, which include operation of an existing vineyard. There are no buildings or

residences on the parcel and the proposed project would not construct any buildings or residences; therefore, the project would not expose people or structures to significant risks. Impacts would be less than significant.

ES.4 ALTERNATIVES TO THE PROPOSED PROJECT [pp 18]

*These are ALTERNATIVES to the proposal. They are *not implementing* any of these alternatives.*

No Project Alternative. Under this alternative, vineyards would not be planted, operated, and maintained on the parcel and no changes to the existing network of undeveloped areas, dirt roads, and hand-cut trails would occur.

Increased Preservation Area Alternative. The Increased Preservation Area Alternative would involve the development of approximately **64.46 net acres of vineyard** within an approximately **84.18-acre cleared area**. This alternative would include the 79.68-acre Preservation Area…, implementation of Mitigation Measures…, supplemented by avoidance of an additional 6.31 acres of biological communities. This alternative would preserve an additional 723 green monardella individuals, 245 holly-leafed ceanothus shrubs, and 1,374 two-carpellate western flax individuals compared to the mitigated proposed project.

Increased Watercourse Setbacks Alternative. The Increased Watercourse Setbacks Alternative would involve the development of approximately **63.36 net acres of vineyard** within an approximately **84.26-acre cleared area**. This alternative would include the 79.68-acre Preservation Area…, with implementation of Mitigation Measures…, supplemented by avoidance of an additional 6.21 acres of biological communities. This alternative would preserve an additional 934 green monardella individuals and 46 two-carpellate western flax individuals compared to the mitigated proposed project. The alternative also would provide increased wildlife movement corridors along the watercourses.

The **Increased Preservation Area Alternative is identified as the environmentally superior alternative** because it would preserve more individuals and habitats of special-status plant species than the Increased Watercourse Setbacks Alternative and the proposed project.

Transportation (Traffic)

[pp 271] Soda Canyon Road has moderate horizontal and vertical curves, and the speed limit is 25 miles per hour. Average daily traffic counts were collected at two locations…

TABLE 3.10-1 [PP 271]
TRAFFIC VOLUMES ON SODA CANYON ROAD

Segment	Peak Hour	Daily
East of Silverado Trail	279	2,336
West of Project Site Driveway	119	664

[pp 272] Access to the project site is available via a private road accessed from Soda Canyon Road, which crosses an adjacent property owned by the Applicant, Gallo Vineyards Inc. No public local roadways

would be used to access the project site, as driveway access is provided directly from Soda Canyon Road.

[pp 276] To put the above-described number of trips into proper context, see Table 3.10-1 for the existing traffic volume on Soda Canyon Road. General rule-of-thumb estimates are that two lane rural roadways have a capacity of at least 5,000 vehicles per day. Therefore, current traffic volume on Soda Canyon Road is approximately 47 percent of practical capacity near Silverado Trail and approximately 13 percent of practical capacity near the driveway leading to the project site. Project trips would not increase that percentage substantially; during both vineyard development and the seasonal harvest, the increase in roadway traffic volumes on Soda Canyon Road would be less than 1 percent for both study roadway segments. The magnitude of anticipated project-related traffic increases is within the range of typical daily variation in traffic levels (usually on the order of ±5 percent) that might be expected on the major roadways serving the project site. Operating conditions on these roadways would remain substantially similar to current conditions. *Not-site-specific; does not touch on dirt road conditions*

TABLE 2-3 [pp 52]
ANNUAL OPERATIONS SCHEDULE

Months	Activity	Workers
January–February	Annual pruning of vines	15
June–August	Chemical, mechanical, and manual weed control Applications of sulfur to protect against mildew	20
September–October	Harvest Winterizing of vineyard, vineyard avenues, and vineyard roads	34
November–April	Monitoring and maintenance of erosion control measures	15

[pp 279] Impact Conclusion: Construction, operations, and maintenance of the proposed project would increase vehicular traffic on Soda Canyon Road; however, this traffic increase would be minor and would not substantially affect response times. No activities would occur within public roadways, meaning that emergency vehicle access would be preserved. Therefore, the impact of construction, operations, and maintenance of the proposed project on emergency access would be less than significant.

Water

[pp 46] Small areas of the proposed vineyard blocks have ground slopes of at least 30 percent; approximately 2.1 acres would be developed on slopes 30 percent or steeper.

[pp 46] The project site is located within the County-designated Rector Reservoir Sensitive Domestic Water Supply Drainage. Napa County Code Chapter 18.108.027, Sensitive Domestic Water Supply Drainages, outlines provisions applicable to such designated drainages, including vegetation clearing limits and winter shutdown requirements.

[pp 197] Implementing the Erosion Control Plan would reduce annual soil loss from the development area by approximately 160.01 tons (29.78 percent) compared to existing conditions. *This is nonsense*

[PP 238] …onsite sediment loading from erosion would decrease with incorporation of the erosion and runoff control measures proposed in the Erosion Control Plan…

[pp 205] Proposed fertilizers (including CAN-17, K-Carb, 10-34-0, and a micronutrient blend) and herbicides (including glyphosate and gluphosinate for weed control) may be applied to the vineyard up to two times per year. Mildewcides (including wettable sulfur, quinoxyfren, and tetraconazole) to protect against mildew may be applied to the vineyard up to three times per year.

[pp 216] The proposed vineyard would be irrigated entirely by groundwater from two existing wells located in the southeastern portion of the project site. Additional wells may be developed in the future, but the overall groundwater demand would not change

[pp 217] Changes to groundwater levels in the project area appear to be heavily influenced by changes in rainfall over time. This finding is based on the apparent correlation between groundwater level trends and rainfall accumulation trends in the period of record. *This does not reflect climate change projections, which suggest an increase in frequency of drought years*

[pp 223] Policy CON-53: The County shall ensure that the intensity and timing of new development are consistent with the capacity of water supplies and protect groundwater and other water supplies by requiring all applicants for discretionary projects to demonstrate the availability of an adequate water supply prior to approval.

[pp 232] During storms, the setbacks from waters described above would act as a filter reducing the potential for pollutants to reach both onsite and offsite drainages. *Inconsistent logic - if this is true, how come current land cover isn't filtering out sediment now; and why is there any need to filter if transport is lower with a vineyard?*

[pp 232] Impact Conclusion: Construction and operation of the proposed project would have a less-than-significant impact on sediment loading, would not impair water quality entering waterways or groundwater…

[pp 234] Water Availability Analysis estimates the project site's average annual groundwater recharge to be approximately 84.1 AF per year…based on an average annual rainfall of 35 inches per year over the project site and a deep percolation rate of 17 percent.

[pp 235] 1,052 AF of groundwater is currently in storage beneath the project site (using water levels measured in April 2018). A groundwater "recharge deficit" of 111 AF during a potential 6-year drought period would represent about 11 percent of the volume of groundwater calculated as currently being stored beneath the property. Temporarily removing an average of 18.5 AF of groundwater from storage for 6 consecutive drought years (approximately 111 AF of "deficit" over the entire 6-year period) may cause water levels to decrease somewhat beneath the project site. However, removing such a relatively small percentage of groundwater from storage over the 6-year time period is not expected to significantly affect groundwater levels beneath the project site.

[pp 235] The anticipated annual water use by the proposed project is below the project site's anticipated annual groundwater recharge rate. *Groundwater is not bound by property boundaries, and adjacent pumping can create flow gradients - groundwater use needs to be assessed cumulatively to get an accurate assessment of impact*

[pp 238] Development of the proposed project would alter the drainage pattern of the project site, but would not result in an increased rate or volume of runoff.

[pp 239] …the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in erosion or siltation on- or offsite, substantial flooding, or impede or redirect flood flows.

[Appendices J & K] Notes: Estimated average irrigation demand as 0.5 acre-feet of water per vineyard acre per year. The proposed 91.3 acres of vineyard will require 45.7 acre-feet of water annually [pp 233], under ideal conditions. Water Availability Analysis estimates the project site's average annual groundwater recharge to be approximately 84.1 AF per year…based on an average annual rainfall of 35 inches per year over the project site and a deep percolation rate of 17 percent. [Appendix J / pp 234]. *Appendix K has a lot of relevant well data - look at this appendix if you are going to address water. Tables summarizing groundwater withdrawal in appendices J and K should be identical, but are substantially different. Text does not address shift to drier climate predicted by climate models.*

Cumulative Impacts

[pp 46] Farm vineyards in a sustainable manner that includes the use of integrated pest management practices and participation in the Napa Sustainable Winegrowing Group and California Sustainable Winegrowing Alliance.

[pp 282] …the geographic scope for resource areas other than air quality (e.g., cultural and tribal cultural resources, geology and soils, hazards, and hydrology and water quality) may be reduced to the Rector Reservoir watershed, or to the immediate vicinity of the project site for resource areas like noise.

[pp 282] Given the nature of the proposed project, a 3-mile radius (shown in Figure 4-1) was generally selected as the outer geographic limit for assessing the potential extent of cumulatively considerable impacts of the proposed project.

[pp 288] Over the past 27 years, approximately 117 acres of agriculture per year (3,167 divided by 27) were developed within the 3-mile radius. Considering Napa County policies and other site selection factors that limit the amount of land that can be converted to vineyard, the development of approximately 351–585 acres within the 3-mile radius over the next three to five years is considered a reasonable estimate.

[pp 290] Federal, state, and local protections for biological resources are by nature cumulative: They prevent the incremental take of special-status species or the removal of associated habitat that could prevent a species from thriving.

[pp 291] Approximately 107.18 acres of potential holly-leaved ceanothus habitat (chaparral and scrub) was identified on the project site, consisting of 71.58 acres of chamise alliance, 5.74 acres of mixed manzanita, and 29.86 acres of scrub interior live oak. The proposed project would avoid about 39 percent of this habitat with implementation of Mitigation Measures… *This does not consider recent fire impacts on populations [same for other plant species of concern]*

[pp 295] The geographic scope for the analysis of cumulative hydrology and water quality impacts consists of the Rector Reservoir watershed. Cumulative runoff impacts could result from the proposed

project combined with the cumulative projects in the watershed if the cumulative rate and volume of runoff to receiving waters were to increase above pre-project levels. …no net increases in peak runoff are expected as a result of the proposed project. The hydrologic analysis attributed decreases in peak discharge to increases in infiltration, vegetative cover, and time of concentration, and to the five proposed detention basins. The decreases in peak discharge would lead to a decrease in erosion, thereby reducing the delivery of sediment to receiving waters and reducing the potential for flooding. Like the proposed project, other projects in the watershed would be required to keep project impacts at pre-project levels, which would ensure that no effects on the cumulative environment would occur. *If this is true, why is Rector Reservoir having sediment problems?*

[pp 295] The Water Availability Analysis demonstrates that under the worst-case scenario (maximum groundwater pumping for the maximum amount of vineyard planting proposed), groundwater recharge would be adequate to meet project demand. Therefore, the overall cumulative effect is not considerable, and the incremental impact of the proposed project would not be significant when considered in the context of the cumulative projects.

[pp 295] The proposed project would not affect surface water quality through sediment or chemical loading or water temperature changes. Therefore, the proposed project would not result in a cumulatively considerable incremental contribution to a significant cumulative impact related to surface water.

Carbon storage
[pp 93] The project's air quality and greenhouse gas emissions are analyzed for a 30-year "lifetime"

Total Project Annual Emissions: 297 metric tons of CO2
Total Project Lifetime Emissions: 8,899 metric tons of CO2

*Source info for estimate of current carbon storage is not included (Data compiled by Environmental Science Associates in 2020 (see Appendix C)

[pp 144] Project proposes to remove 17.25 acres of mature forest (California Bay–Madrone–Coast Live Oak–(Black Oak, Big-Leaf Maple)); and 2.52 acres of mixed manzanita, 6.1 acres of grassland, and 62.72 acres of chaparral

Other topics of interest
Nighttime activities would include:

- Frost protection, with two wind machines operating, typically in April and May for approximately 15 hours per month.
- Harvest between 10 p.m. and 6 a.m., typically in October.
- Sulfur applications approximately 12 times per year between 9 p.m. and 6 a.m., typically in May and June.

No pre-emergent herbicides would be sprayed in the vine rows for weed management. Contact or systemic herbicides may be applied in the spring (no earlier than February 15).

Operation of the irrigation system would require the use of a proposed diesel generator that is anticipated to be used for approximately 714 hours (29.75 days straight) per year to draw water from the groundwater wells onsite to irrigate the vineyards.

[pp 83] Open Burning—Condition of Approval (air quality section):
The owner/permittee shall conduct open burning of cleared vegetation in accordance with BAAQMD Regulation 5, which allows open burning only during specified burn periods. Prior notification shall be submitted to BAAQMD and documentation of compliance shall be submitted to Napa County.

[pp 86] A publicly visible sign shall be posted with the telephone number and person to contact at Napa County regarding dust complaints. *Where will this sign be located?*

No mention of special status species downstream: rainbow trout, California giant salamander, and foothill yellow-legged frog

4.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS
[pp 297] All impacts can be feasibly mitigated to less-than-significant levels. Therefore, there would be no significant and unavoidable adverse impacts.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES
[pp 297] …long-term project operation is not anticipated to result in substantial long-term consumption of energy and natural resources. The proposed project is not proposing the development of a previously inaccessible area. Vineyard development has occurred and would continue to occur in the area with or without the proposed project, based on development allowed by the existing Napa County Land Use Plan and zoning. Thus, the proposed project would not commit future generations to a significant irreversible change. Conversion to agricultural land is not considered an entirely irreversible type of development, which is why agricultural lands are often protected to prevent conversion to other land uses. Therefore, the proposed project would not result in substantial long-term consumption of energy and natural resources.

4.4 GROWTH-INDUCING IMPACTS
[pp 297] A project can have indirect or secondary growth inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand.

Because of the limited amount of work that would be required at any given time, and because the proposed project would not require a substantial workforce, no new homes, businesses, or roads would be constructed and the proposed project would not have a significant effect on the local workforce. *This contradicts the claim that the project will "Provide opportunities for additional vineyard employment and economic development in Napa County." [pp 16]*

The proposed project would not increase the area available for development of housing and would not result in indirect growth-inducing impacts. Further, the proposed project would not result in the construction of new housing or any other public or private services or utilities, or in improvements to access roads or extension of any new transportation routes that would provide access to new locations in the project area. Therefore, the proposed project would not result in direct growth-inducing impacts.