



## MEMORANDUM

**DATE:** January 9, 2015  
**TO:** Herb Fredricksen  
**FROM:** Shanna Guiler, AICP and Laura Lafler  
**SUBJECT:** Response to Comments  
Napa Vine Trail, Oak Knoll District Initial Study/Mitigated Negative Declaration

In accordance with CEQA Guidelines Section 15073, the Initial Study/Draft Mitigated Negative Declaration was circulated for public review for a total of 30 days beginning on November 24, 2014 and ending on December 23, 2014. Three comment letters were received by Napa County Transportation and Planning Agency during this comment and review period. Persons or agencies that provided comments included the following:

- A. Mr. Scott Morgan, State Clearinghouse;
- B. Mr. Phillip M. Miller, P.E., Napa County Flood Control and Water Conservation District;
- C. Mr. John Draper, Town of Yountville;

Copies of these comment letters are provided in this appendix and responses to the substantive issues raised by the commenters are provided on the page following the letter. When cross-referenced in the text, the comment is referred to as Letter-# where the letter refers to the commenter, and the number following the hyphen refers to the comment number within that letter. For example, comment B-3 refers to the third comment within the letter submitted by the Napa County Flood Control and Water Conservation District.



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

December 17, 2014

RECEIVED  
DEC 29 2014  
MORAN

Herb Fredricksen  
Napa County Transportation & Planning Agency  
625 Burnell Street  
Napa, CA 94559

Subject: Napa Valley Vine Trail Project - Oak Knoll District  
SCH#: 2014112034

Dear Herb Fredricksen:

1

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on December 15, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014112034  
**Project Title** Napa Valley Vine Trail Project - Oak Knoll District  
**Lead Agency** Napa County

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**Type** MND Mitigated Negative Declaration

**Description** The proposed project would construct a new 6-mile section of the Napa Valley Vine Trail connecting two existing segments of the Vine Trail, the Commuter Bike Path in Napa and the Yountville Mile. The proposed Class I bicycle/pedestrian path would be located within public right-of-way, between the Napa Valley Wine Train right-of-way and Solano Avenue. The path would be an asphalt concrete path 10 feet in width with 2-foot shoulders. Prefabricated truss bridges would be needed to span two manmade drainage channels and modifications made to the existing Solano Avenue bridge to span Dry Creek. Proposed improvements include: ADA compliance curb ramps, two traffic signals, stop signs, fencing, and pavement markings.

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**Lead Agency Contact**

**Name** Herb Fredricksen  
**Agency** Napa County Transportation & Planning Agency  
**Phone** 707 259 5951 **Fax**  
**email**  
**Address** 625 Burnell Street  
**City** Napa **State** CA **Zip** 94559

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**Project Location**

**County** Napa  
**City** Napa, Yountville  
**Region**  
**Lat / Long**  
**Cross Streets** SR 29, Solano Avenue, Redwood Road, California Drive  
**Parcel No.**  

<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>
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**Proximity to:**

**Highways** SR 29  
**Airports**  
**Railways** Napa Valley Wine Train  
**Waterways** Yountville Collector, Salvador Channel, Dry Creek  
**Schools**  
**Land Use** Napa County: Agricultural Resource / City of Napa: SFI, MFR, TC, LC, PS/Yountville: Public Facilities

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**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 4; Caltrans, Division of Transportation Planning; Air Resources Board; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

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**Date Received** 11/14/2014 **Start of Review** 11/14/2014 **End of Review** 12/15/2014

**Responses to Letter A**  
**Scott Morgan, Director; State Clearinghouse**

- A-1: Comment noted. This comment acknowledges the State Clearinghouse's receipt of the Mitigated Negative Declaration for the proposed project. The comment does not address the adequacy of the CEQA document or suggest changes to the document itself. No further response is necessary.



# Napa County Flood Control and Water Conservation District

PHILLIP M. MILLER, P.E.  
DISTRICT ENGINEER

November 18, 2014

## Vine Trail CEQA Comments

Comment #	Page Number/Paragraph	Subject	Comment
1	5/7	Stormwater	Will there be stormwater BMP's or Low impact development type mitigation measures such as swales, utilized as part of the proposed stormwater conveyance infrastructure?
2	7/3	Solano Ditch	Unnamed channel is known as Solano Ditch
3	7/5	Concrete Outfall	Replacement of 155 foot concrete apron-Would there be any mitigation of the channel banks or channel up and downstream of project area?
4	8/4	Dry Creek	CEQA document refers to dry creek as a minor tributary which is misleading because it is in fact a large tributary with significant ecological value.
5	8/5	Vegetation Communities	This section does not discuss riparian canopy structure or significance of large mature Oak trees on the Valley Floor. This section also states that "none of these Oak stands resemble natural Oak woodlands"; however, some of these Oak trees are 150 to 250 years old and are part of the original valley floor Oak Savannah therefore although fragmented by land use and development these trees are remnants of and do resemble the natural Oak woodlands found on the valley floor.
6	9	Public Agencies	Napa County Flood Control and Water Conservation District should be listed
7	20/1	Environmental Effects	Paragraph does not discuss the riparian vegetation associated with the drainage channel and associated impacts of path on native riparian understory.
8	21/2	Pavement	Has permeable pavement been consider as an alternative to asphalt? Specifically on reaches adjacent to drainage channels.
9	22/1	Significant trees	Of the 73 significant trees to be removed, mitigation efforts should more effectively offset the associated impacts through an increased mitigation ratio than a 1:1 ratio. Refer to Napa County General Plan standards.
10	34/3	Riparian woodland	This paragraph omits the riparian habitat that exists along the north section of Yountville collector, trees along this reach include Alders ( <i>Alnus rhombifolia</i> ), willows ( <i>Salix</i> sp.), Black wanuts and Valley oak

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11	34/7	Drainage Channel	LSA identified Sanford's arrowhead ( <i>Sagittaria sanfordii</i> ). This may have been misidentified. <i>Alisma lanceolatum</i> is a very similar plant that is wide spread in this reach.
13	43/1	Northern California black walnut <i>Juglans californica</i> var. <i>hindsii</i>	Recent genetic testing of Black Walnut trees in the Napa Valley has shown presence of a natural community of <i>Juglans californica</i> var. <i>hindsii</i> .
14	52/1	Special-Status Plants	See comment above.
15	65	Bio-15	The 2:1 ratio for large Oak trees (>6 in DBH) does not seem adequate.

## Responses to Letter B

### Phillip M. Miller, P.E.; Napa County Flood Control and Water Conservation District

- B-1: Per the Phase II Small Municipal Separate Storm Sewer System (MS4) permit (NPDES Permit Order No. 2013-0001) (Section E.12.c(ii)(c)4.c.), impervious trails built to direct stormwater runoff to adjacent vegetated areas are exempt from implementing Low Impact Development (LID) or similar stormwater control measures. The proposed project conforms with this criteria – runoff would be directed into adjacent vegetated areas before entering the storm drain system. No changes to the IS/MND are required.
- B-2: Comment noted. The text will be changed to refer to the unnamed drainage channel as the Solano Ditch.
- B-3: No compensatory mitigation beyond Mitigation Measures (MM) BIO-9 through BIO-12 is proposed due to the limited area affected and the lack of new temporary or permanent fill. The new culvert will be constructed entirely within the footprint of the existing concrete apron.
- B-4: Comment noted. The word “minor” will be removed when referring to Dry Creek as a tributary to the Napa River.
- B-5: Comment noted. The end of this paragraph will be revised as follows: “...rather than woodland stands. Several valley oaks are very large and likely constitute remnants of the extensive valley oak savannah that historically covered the Napa Valley floor. Native oak woodland stands are often mixed with a variety of non-native escaped ornamental trees and the understory is dominated by annual grasses or dense patches of ruderal forbs. ~~Given the urban to semi-rural nature of the project area, none of the oak stands resemble natural oak woodlands such as those in the foothills on either side of the Napa Valley.~~”
- B-6: Comment noted. The Napa Valley Flood Control and Water Conservation District will be added to the list of agencies on page 9 of the IS/MND.
- B-7: Assuming that the comment is referring to the native riparian plantings on the east side of the Yountville Collector between Hoffman Lane and Hillview Lane, please see revised text in the below response to Comment B-10. Based on LSA’s observations during the 2011 and 2013 site visits, the existing informal access road on which the trail will be constructed primarily supports non-native ruderal species, with native riparian plantings limited to the adjacent channel bank to the south. As such, the project is not expected to impact native riparian understory plants.
- B-8: Permeable pavement was considered; however, the NCTPA ultimately determined that permeable pavement was infeasible due to project timing and maintenance requirements. This comment does not relate to the adequacy of the CEQA IS/MND; therefore no further response is necessary.

- B-9: Mitigation for the removal of native oak trees within unincorporated Napa County is addressed under MM BIO-15 (p. 65), which requires a 2:1 tree replacement ratio in accordance with Policy CON-24 of the Napa County General Plan.
- B-10: Comment noted. The riparian restoration plantings along the east side of the Yountville Collector were not identified as riparian woodland because they have not yet developed the multi-layered vegetation structure (i.e., canopy, subcanopy, and dense understory shrub layer) that characterizes mature riparian habitat such as that adjacent to Dry Creek. To make this clearer in the IS/MND, the paragraph will be revised as follows:

**Riparian VegetationWoodland.** Riparian ~~vegetation~~woodland in the project area is limited to mature riparian woodland adjacent to Dry Creek south west of the Solano Avenue bridge and numerous Fremont cottonwoods that have been planted along the eastern edge of the Yountville Collector south of Hoffman Lane as part of a riparian restoration project implemented by the Napa County Flood Control and Water Conservation District. No riparian vegetation is present east of at the location of the proposed existing bridge over Dry Creek where bridge widening will occur. Dominant trees along ~~this reach of~~ the creek west of Solano Avenue include Fremont cottonwood and California black walnut with a shrub layer dominated by willows (*Salix* sp.) and valley oak saplings. A few large ornamental blue gum trees are present along the top of the northern bank. Although the riparian restoration area south of Hoffman Lane provides some habitat value for native wildlife, it does not yet support a multi-layered vegetation structure (i.e., canopy, subcanopy, and dense understory shrub layer) characteristic of mature riparian forest or woodland, and thus is of lower habitat quality than the woodland along Dry Creek.

- B-11: LSA botanist Zoya Akulova observed more than seven anthers on the flowers of the subject plants, confirming its identity as *Sagittaria sanfordii* since *Alisma* species only have six anthers. In addition, Ms. Akulova submitted her photos and documentation to Napa County botanical expert Jake Ruygt, and he agreed with her identification. Mr. Ruygt subsequently visited the site on June 11, 2011 and confirmed that the observed plants were indeed *Sagittaria*.

No comment 12

- B-13: Comment noted. LSA consulted three primary references when researching the status of *Juglans hindsii* in the Napa Valley: the California Natural Diversity Database (CNDDDB), the Jepson eFlora (<http://ucjeps.berkeley.edu>), and the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Plants* (CNPS Inventory). The only CNDDDB occurrence in the project vicinity is a 2001 observation of a single specimen in Napa City Park; a thorough 2005 search failed to locate this individual and this occurrence is now considered extirpated (CDFW 2014). In addition, the CNPS Inventory indicates that only one, native occurrence of this species appears viable as of 2003, and maps its occurrence in the Napa U.S. Geological Survey (USGS) quadrangle as "presumed extirpated or unknown" (CNPS 2014). Based on this information, LSA concluded that the black walnut specimens observed in the project area are likely naturalized rather than native specimens. LSA is unaware of the genetics study referenced by the District and would need to review it before acknowledging the possible presence of the species within the project area.

B-14: See response to Comment B-13.

B-15: As stated in the above response to Comment B-9, the 2:1 tree replacement ratio is consistent with Policy CON-24 of the Napa County General Plan: “Provide replacement of lost oak woodlands or preservation of like habitat at a 2:1 ratio when retention of existing vegetation is found to be infeasible.” The Napa County General Plan does not specify or require different mitigation ratios depending on the size of the trees to be removed (e.g., larger trees to be removed must be replaced at a greater ratio).



Sent via electronic mail: Hard copy to follow.

December 15, 2014

Napa County Transportation and Planning Agency/Napa Valley Transportation Authority  
625 Burnell Street  
Napa, CA 94559

Attention: Herb Fredricksen

Subject: Napa Valley Vine Trail – Comments on CEQA Draft Mitigated Negative Declaration

Dear Mr. Fredricksen,

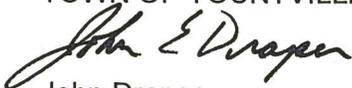
Thank you for the opportunity to comment on the Draft Mitigated Negative Declaration. The Town's comments are listed below:

1. Page 5, Paragraph 3: The statement regarding no grading within 5' of top of bank does not seem accurate. Proposed improvements include putting in bridges and grading within the bank of the ditch.
2. Page 5, Paragraph 4: The 15,000 cubic yards of off-haul may need more than two staging areas. Are other staging areas proposed?
3. Page 5, Paragraph 5: Staging: The park-and-ride staging area must be approved by the Town's Planning Director. A 6' construction fence with green screen is typically required.
4. Page 6, Paragraph 3: Stations 0-1600: The California Drive overpass area of approximately 500 feet is not included.
5. Page 6, Stations 0+00 to 16+00: It states that the wall height is not anticipated to exceed 3 feet in height. However, the current plans show the height to exceed 3 feet from Station 3+50 to 7+50 with a peak height of 3.82 feet. Page 21 states retaining wall max 5'.
6. Page 21, Railings: Retaining wall railings within the Town of Yountville must be approved by Town's Zoning and Design Review Board (ZDRB). Consider railings to match railings on the bridge at California Drive/Washington Street.
7. Page 21, Kiosk: The kiosk/rest area must be approved by the Town's ZDRB. Consider rural designs.
8. Page 22, Oak Trees: The oak trees to be removed in Yountville must be approved by the Town Council.
9. Page 22, Signs: The signs in Yountville must be wood wrapped per Town standards.

10. Page 34, Wetlands Designations: Are the ditches that feed Hinman along Solano Avenue considered wetlands, especially where the Vine Trail will build retaining walls?
11. Page 94, Land Use: The staging area location must be approved by the Town's Planning Director. A 6' construction fence with green screen is typically required.
12. Page 99, Work Hours: Work within the Town of Yountville is restricted to 9am-6pm weekdays with no weekends or holidays, unless approved by the Town Manager. Check for special events before closing traffic lanes.
13. Page 102, Rest Stop and Structure: All uses and structures proposed on the north side of California Drive at Solano Avenue must be approved by Town Council, Parks Commission, Zoning and Design Review Board.
14. Page 111, Utilities: Yountville prohibits the use of potable water for construction purposes. Recycled water is available at the Waste Water Treatment Plant.
15. Page 111, Drinking Fountains: Will a waterline be extended up Solano Avenue for drinking fountains?

If you have any questions, please call me at 707-944-2602.

Sincerely,  
TOWN OF YOUNTVILLE



John Draper  
RGS Contract Civil Engineer for Town of Yountville

Cc: Steve Rogers, Town Manager (via e-mail)  
Joe Tagliaboschi, Public Works Director (via e-mail)  
Sandra Smith, Planning Director  
Debra Hight,

File

## Responses to Letter C

### John Draper; Town of Yountville

C-1: Page 5, paragraph 3 of the IS/MND will be revised as follows:

The proposed trail alignment would consist primarily of a 10-foot wide paved path, and 2-foot wide shoulders for a total width of 14 feet. Disturbed areas would extend beyond the edges of the path at a 2:1 maximum slope in order to conform to existing grade and provide minimal alteration of existing drainage conditions. ~~No grading would occur within 5 feet from the established top of bank.~~ Where constrained by property lines, easements or a change in grade such that a built up slope is not feasible, short retaining structures would be built, typically in locations where the east edge of the trail would align horizontally within an existing drainage feature. The proposed trail would cross three (3) separate drainage channels (Yountville Collector, Dry Creek and Salvador Channel). Trees would be removed with mitigated plantings within the project limits.

C-2: No additional staging areas are proposed. If required, the contractor will secure additional staging areas consistent with local standards. No changes to the IS/MND are required.

C-3: Comment acknowledged. This comment does not relate to the adequacy of the CEQA IS/MND; therefore no further response is necessary. The details of the staging area would be submitted for review by the Town of Yountville Planning Director and would comply with the Town's design guidelines.

C-4: Page 6, paragraph 3 of the IS/MND will be revised as follows:

California Drive from Terminus of Yountville Mile to Station 0+00 (California Drive Overpass Area). To accommodate the proposed path, widening of the existing sidewalk and street crossings along California Drive would be conducted to connect the proposed trail to the Yountville Mile. Work in this area would include demolition of the existing curb, gutter, and sidewalk and installation of a new curb, gutter and sidewalk to increase the overall width of the walkway on the north side of California Drive from 10 to 14 feet. New curb ramps would be installed and crosswalks would be restriped, as needed.

Stations 0+00 to 16+00 – California Drive to Southern Limit of Yountville (1,600 feet). To accommodate the proposed 10 foot path, widening of the existing sidewalk and street crossings along California Drive would be conducted to connect the proposed trail to the Yountville Mile. The trail in this segment would require approximately 1,500 feet of retaining wall along its eastern side, parallel to the existing Wine Train right-of-way. The wall is not anticipated to exceed ~~3~~ 5 feet in height. Along the western edge of the trail, a curb is proposed to provide a barrier between automobile and bicycle traffic. Re-striping and additional paving along the western edge of Solano Avenue would be necessary to accommodate the trail and buffer zone. Approximately seven (7) trees of varying species and size would be removed in this segment to accommodate the proposed alignment. The disturbed area for this segment would be approximately 30,400 square feet (sf).

C-5: See Response C-4 above. Page 6, paragraph 3 of the IS/MND will be revised to acknowledge that the retaining wall in this section of the trail would be no greater than 5 feet in height.

- C-6: Comment acknowledged. The project, as proposed, would install black railing consistent with the trail segments in Napa County and the City of Napa. It is our understanding that the Town of Yountville (both the Public Works and Planning departments) had reviewed and accepted the black railings. It is preferable for this regional trail to have a uniform design across all jurisdictions. This comment does not relate to the adequacy of the CEQA IS/MND; therefore no changes to the IS/MND are required.
- C-7: Comment acknowledged. No kiosks are currently proposed.
- C-8: Comment acknowledged. As required under Mitigation Measure BIO-16, removal and replacement of native trees (e.g., oaks) within the Town limits will be done pursuant to Section 12.16.010 of the Town's Municipal Code.
- C-9: Comment acknowledged. This comment does not relate to the adequacy of the CEQA IS/MND; therefore no further response is necessary. NCTPA and Riechers Spence, as the project engineer, will work with the Town to comply with local design standards.
- C-10: The extent of wetlands under the jurisdiction of the U.S. Army Corps of Engineers is shown on Figures 3A through 3F of the IS/MND along with the proposed project elements. As shown, the U.S. Army Corps of Engineers (Corps) claimed jurisdiction over the northern portion of the Yountville Collector (Yountville Collector A) as "wetlands" rather than "other waters" of the United States due to the presence of emergent wetland vegetation. This area of the Yountville Collector receives the entire flow from Hinman Creek. As shown on Figure 3, no wetland areas are located in the area of proposed retaining walls. Furthermore, all retaining walls will be constructed outside the top-of-bank and no work will be required within the channel.
- C-11: See Response to Comment C-3.
- C-12: Comment acknowledged. Typical work hours would be 8:00 AM to 5:00 PM, Monday through Friday. The proposed project will request an exception to the Town's work hour limits from the Town Manager to accommodate the construction schedule. This comment does not relate to the adequacy of the CEQA IS/MND. No changes to the IS/MND are required.
- C-13: Comment acknowledged. Necessary approvals from the Town Council, Parks Commission, Zoning, and Design Review Board will be obtained for proposed improvements on the north side of California Drive at Solano Avenue within the Town of Yountville.
- C-14: Comment acknowledged. No potable water will be used for construction purposes within the Town of Yountville.
- C-15: No drinking fountains are proposed as part of the Vine Trail Project. Therefore, a waterline will not be extended up Solano Avenue.

## REFERENCES

California Department of Fish and Wildlife (CDFW). 2014. California Natural Diversity Database (CNDDDB). Commercial version dated December 9, 2014. Biogeographic Data Branch, Sacramento.

California Native Plant Society (CNPS). 2014. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society Rare Plant Program, Sacramento.  
<<http://www.rareplants.cnps.org>> (accessed December 30, 2014).