

# EXHIBIT K

## V. SATTUI HIBBARD RANCH VINEYARD CONVERSION Response to May 21<sup>st</sup>, 2019 Completeness Determination from Napa County #P19-00069-ECPA

**1. Agricultural Erosion Control Plan Application Completeness Items:** This information is necessary to clearly describe and understand the full extent of the proposed conversion project and adequately disclose and assess potential impacts of the project pursuant to CEQA.

- a. Water Rights Place of Use (POU): Provide an exhibit/plan that shows existing and proposed vineyard within the parcel overlain by POUs and corresponding allowable acreage within each POU identified in Water Right Permit #20779. While it appears that the project may have been sited to observe Water Rights POU acreage limitations, this information is necessary to confirm that the proposed project in conjunction with existing vineyard is consistent with the property's Water Right Permit.

**The requested map showing the water rights POU, existing vineyard, and proposed vineyard has been included with this resubmittal package.**

**There are approximately 1.3 acres of proposed vineyard outside of the authorized POU for Water Right Permit #20079. The Applicant also has two existing onsite wells and water tanks that provide supplemental irrigation water as shown on the revised Site Plan. Accordingly, a Water Availability Analysis (WAA) has been prepared and is included with this resubmittal package to cover the use of groundwater for irrigation of 1.3 net acres.**

- b. Water Storage and Use: Provide the storage capacity of the existing reservoir and confirm that the proposed vineyard is anticipated to utilize approximately 0.4 acre-feet of water per acre of vineyard for a total anticipated use of 15 acre-feet annually.

**As discussed in response #1a above, there are two water sources for the vineyard proposed in this Track I ECP. As shown in the attached figure, the approximately 32.7 net acres of proposed vineyard within the place of use (POU) of Water Right Permit #20079 would be irrigated with surface water. The approximately 1.3 net acres of vineyard outside of the POU would be irrigated with groundwater from the existing onsite wells, as described further in the WAA prepared for the project.**

**According to data provided by the vineyard manager, the existing vineyard is irrigated with approximately 0.2 acre-feet per acre. As stated in Attachment A Supplemental Project Information submitted with the original ECP, it is**

**conservatively assumed that the proposed vineyard may require 0.4 acre-feet of water per acre for irrigation which would cover increased irrigation rates during the vine establishment period, although it is anticipated that the long-term water usages would likely be approximately 0.2 acre-feet per acre consistent with the existing onsite vineyards.**

**In summary, up to 15 acre-feet of surface water may be used for the proposed project assuming an irrigation rate of 0.4 acre-feet per acre in the short term. Approximately 0.25 acre-feet of groundwater would be used for the proposed project in the long-term assuming an irrigation rate of 0.2 acre-feet per acre.**

**The maximum capacity of the existing reservoir is approximately 50 acre-feet.**

- c. ECPA plans: Please provide revised plans that include, show or clarify the following:
- i. The required stream setbacks to their full extent at stream heads including percent slope between the top of bank or stream head and proposed limits of disturbance located adjacent to Vineyard Blocks 5, 6B and 6C, and revised block boundaries as necessary to avoid encroachment into required setbacks. Any development proposed within required stream setbacks will require the submittal of a Conservation Regulations Use Permit Exception application pursuant to NCC Section 18.108.040.

**This has been completed, please refer to Sheets 2 through 6 of the revised ECP dated October 2019.**

- ii. Revised vineyard block boundaries avoiding and providing a minimum 50 foot buffer from all landslides (i.e. *Qls*) identified in the Project's Engineering Geotechnical Investigation (Gilpin Geosciences, Inc. March 2019). Furthermore, while it is indicated on the ECPA plan sheets and narrative that landslides within proposed Vineyard Blocks 5 and 6C will be repaired per the geotechnical report, there are neither recommendations nor details in the Engineering Geotechnical Investigation, nor are there details of said repairs in the ECPA Plans: also see Item #1.e.

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019, which now includes more robust descriptions and details for the repair of onsite landslides. The ECP has been revised in the location of each mapped landslide to directly reference the recommendations required in the supplemental**

**Geological and Geotechnical Evaluation. Blocks 1B, 4C, 7B, 8H and 9 were redesigned to incorporate the recommended setbacks.**

- iii. Revised block boundaries avoiding and providing a minimum 50 foot buffer from all Purple needle-grass grassland mapped within the property, and any wetlands that may occur within the project area (see Item #2 for additional details regarding wetlands).

**As discussed in the Biological Resources Report dated December 2018 and included in the original submittal, there are 0.62 acres of purple needlegrass grassland over the entire property, and the proposed project would impact 0.2 acres (32.6 percent). This meets the 2:1 ratio of preserved to impacted sensitive grassland as required by General Plan Policy CON-17.**

**Avoidance of 100% of the purple needlegrass grasslands was not recommended by the biologists and has not been required of other projects in Napa County. The Biological Resources Report did recommend setting aside the remaining onsite purple needlegrass grassland (see Recommendation 2 on page 20), and we assume that any additional mitigation or specifics regarding the type of permanent preservation would be analyzed in the CEQA document prepared for the project.**

**See the supplemental biological response memorandum prepared by WRA dated September 26, 2019 for additional discussion.**

- iv. Location(s) of new and existing primary irrigation lines and connections to existing main irrigation lines that will supply the proposed vineyard.

**Proposed irrigation-related infrastructure will be identified after the final mitigated block configuration is determined. Irrigation mainlines and related infrastructure will be located within clearing limits shown on the ECP and/or existing and proposed roads, which is discussed in Section 8b of the ECP Narrative.**

- d. ECPA Narrative: Please provide a revised narrative or supplement that includes the following information:
  - i. Confirmation that slopes in the 30%-50% slope range located within the proposed Vineyard Block 6 complex and Vineyard Block 7 complex do not exceed 1-acre in area. Clearing of areas in the 30%-50% slope range exceeding 1-acre in size within a contiguous clearing (i.e. Vineyard Block complex) will require a Use Permit Exception application pursuant to NCC Section 18.108.

**The Block 6 complex has been redesigned and confirmed that slopes greater than 30% do not exceed 1-acre in size. The Block 7 complex was also confirmed and does not exceed 1-acre total of areas over 30% slope. Please refer to Sheets 3 and 6 of the revised ECP included with this resubmittal package.**

- ii. The limits and depth of land ripping for vineyard development (also see Item #1.e.).

**The limits of ripping will be the proposed vineyard clearing limits; ripping will not extend outside of areas proposed for clearing. Ripping will be a maximum depth of 48” unless located in areas where slope stability is a concern as outlined in the supplemental Geological and Geotechnical evaluation memo dated October 11, 2019. The maximum depth of ripping in these areas shall not exceed 24 inches per the report. This has been updated in Section 1c of the ECP Narrative.**

- iii. Pursuant to NCC Section 18.108.120, provide a description and details necessary to repair the large gully that has formed in the last 7 to 10 years along the western periphery of Vineyard Block 7A (also see Item #2 and the Engineering Division Memo for additional details).

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019.**

- e. Geotechnical Report: Please provide an update or addendum to the Engineering Geotechnical Evaluation prepared by Gilpin Geosciences, Inc. (March 2019) that includes a Landslide Hazard Evaluation: see Attachment F *Guidelines for Landslide Hazard Evaluations* that are enclosed for your reference. The report should also describe and evaluate the following:
  - i. The effects on slope stability due to the proposed ECPA related to increased infiltration due to proposed ripping depths. The report should also provide ground preparation recommendations and buffers from landslides to maintain slope stability.
  - ii. The effects and any changes in sediment delivery amounts based on the project including changes in the amount of sediment delivered to drainageways as compared to existing conditions.
  - iii. The effects and any potential impacts and threats to both on and off site resources (i.e. aquatic resources and streams) as a result of the project as compared to existing conditions.
  - iv. Landslide Designations for all landslides (i.e. *Q/s*) shown on Figure 4. The landslides located in proposed Vineyard Blocks 5, 6C and west of Blocks 1 and 8 do not appear to be shown.

**Please refer to the supplemental Geological and Geotechnical  
Evaluation memo dated October 11, 2019.**

- f. Road Plan: An addendum/update to the Road Plan (ECPA Appendix D, PPI Engineering, February 2019) showing all new access roads and existing access roads necessary to develop and support the proposed vineyard and ongoing operations. The Road Plan will need to describe and detail the grading necessary to develop new access roads, and for existing roads describe the extent of improvements and grading necessary to upgrade roads to provide adequate vineyard access. The Road Plan should also include best management practices necessary to improve current hydrologic conditions and related soil loss and runoff as a result of the increased intensity in use of these roads as a result of the project. While some of these details are provided in the ECPA Road Plan, given the property's existing road system, that includes roadside ditches, culverts and water crossings, and necessary new access roads, a more detailed plan is necessary to adequately disclose and assess project components associated with road system development and maintenance.

Based on review of #99230-ECPA for the property, historic aerial imagery interpretation, the site inspection, and consultation with the County Engineering Division, it is evident that existing roads/trails east of the blue-line tributary to Carneros Creek that are proposed to provide access to Vineyard Block Complexes 1, 7 and 8 appear to have been developed sometime after 2010. This is of particular concern for the roads or portions thereof located within required stream setbacks (such as between Vineyard Block 7C and existing vineyard to the south), and/or are located on sloped in excess of 30% (such as located between Vineyard Blocks 8A and 7D and in areas between Vineyard Block 7C and existing vineyard to the south). For portions of access roads that occur on slopes over 30% as show on County GIS Topographic Maps, provide slope calculations for the access prepared according to the ECPA Slope Determination Methodology for Roads (enclosed). Furthermore, it does not appear that there are existing road(s) available to access Vineyard Block 1.

Therefore, any grading or improvements to provide adequate access for vineyard development and operations, including assessment of roads that may have been developed without proper review and authorization, will need to be shown and detailed. Any new areas of earthmoving and associated tree removal to install and/or improve access roads will need to be included and accounted for in the project acreages and considered in the Soil Loss and Hydrologic modeling in that they are part of the project. Additionally, while it is indicated that irrigation lines will be located in existing roadways any trenching or earthmoving activity necessary to install irrigation lines within required stream setbacks may

necessitate a Use Permit Exception. This information is necessary to show the extent of maintenance and improvements to access roads located within the property, determine if proposed road improvements and upgrades located within required stream setbacks will necessitate a use permit exception, and will also be beneficial for verification and compliance with the Farm Plan requirements for vineyard properties in the Napa River watershed prescribed by the San Francisco Bay Regional Quality Control Board (Order #R2-2017-0033). Also see the Engineering Division Memo for additional details.

**We understand that the requested updates to the Road Plan are to ensure compliance with the San Francisco Bay Regional Water Quality Control Board (RWQCB)'s General Permit for Vineyard Properties in the Napa River and Sonoma Creek Watersheds. Although this property is located in an area that was burned in the October 2017 fires and therefore is not required to prepare a Farm Plan until the year 2021, Fish Friendly Farming has updated Element 5 of the Farm Plan early to address this comment. Please see Element 5 included with this resubmittal package.**

**The road located to the east of the blue line stream is existing and has been since at least 1993. Anecdotally, the ranch manager reports that the road was used historically as part of the ongoing cattle operations on the property. As shown in the 1993 Google Earth image below, it can be seen that this is a main access point for vineyard blocks on the eastern portion of the property. No significant improvements are required to utilize this road, and as shown on the Site Plan, where the road enters the proposed vineyard block it will be treated as a vineyard avenue and will observe applicable County stream setbacks pursuant to Section 18.108.025, and will be straw mulched, vegetated, and have straw wattles installed per the ECP.**

**Road designs and slope calculations for the short segments of road between Blocks 7 and 8 and Blocks 1 and 8 have been provided in the revised Track I ECP, please refer to Sheets 8 through 11 for details. These segments of access road have also been incorporated into the revised soil loss and hydrologic analyses included with this resubmittal package.**

**Southern portion:**

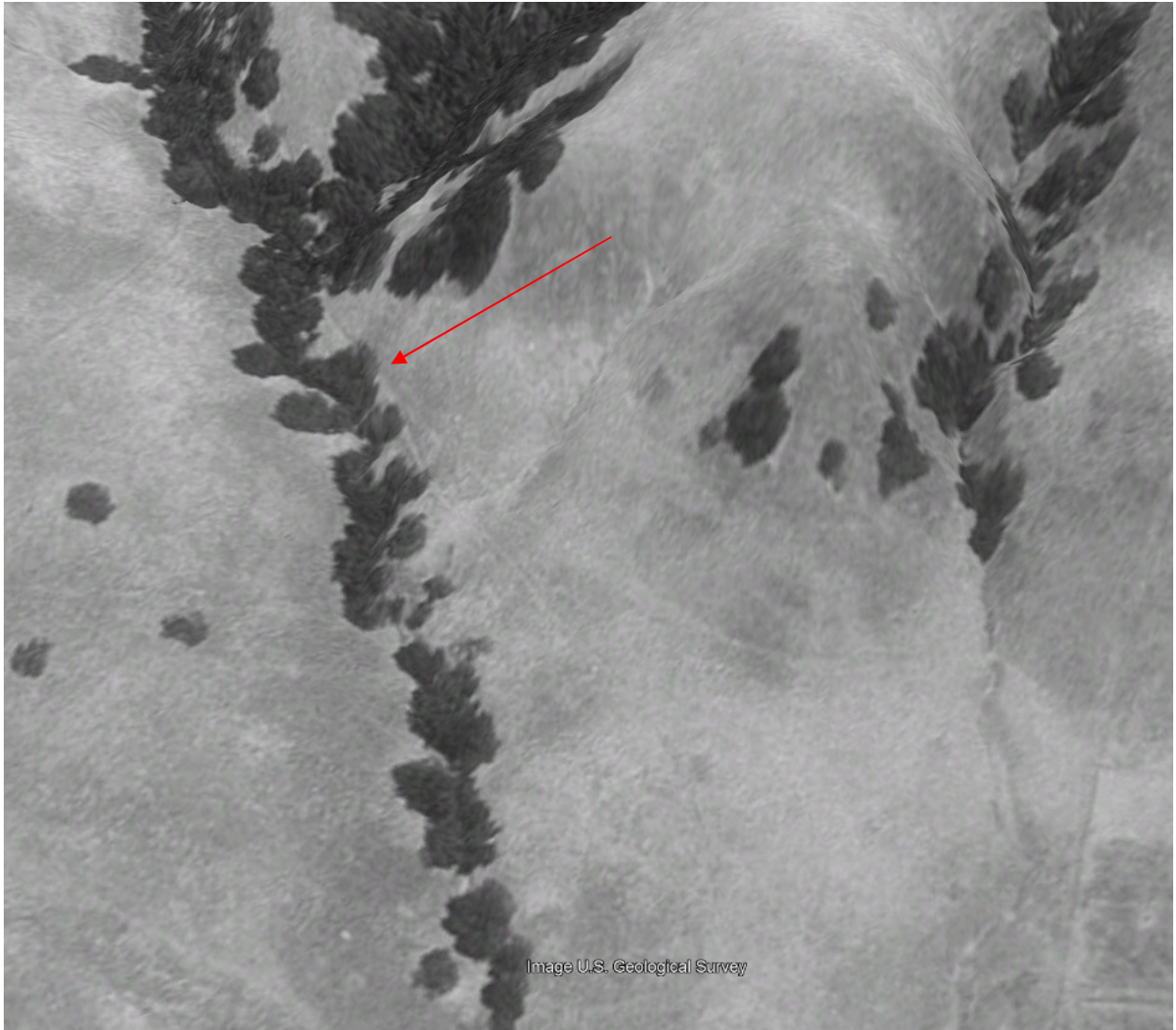
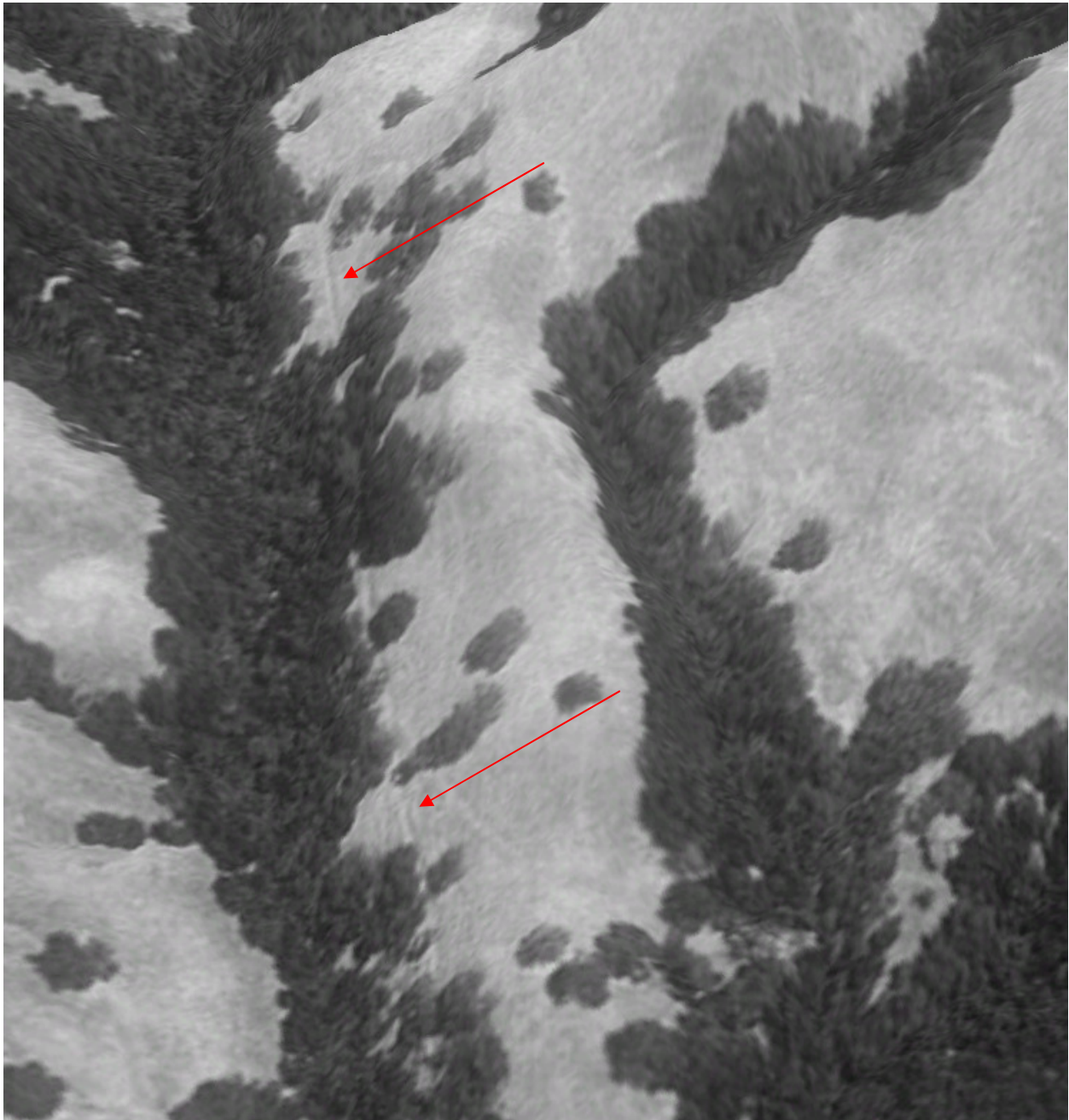


Image U.S. Geological Survey



**Northern portion:**



2. **Supplemental Environmental Information:** The following information is necessary for the County to adequately evaluate potentially significant impacts of the proposed project pursuant to CEQA, and to complete the ECPA application to continue its review and processing:
  - a. **Biological Resource Information:** Please provide an addendum or update to the Biological Reconnaissance Survey Report prepared by WRA Environmental Consultants (December 2018) that includes and/or expands on the following



information so that potential impacts to trees and oak woodlands and to special-status habitat can adequately be disclosed and assessed:

- i. Identify the anticipated number of trees, including species and diameter at breast height (dbh), of trees being removed as part of the project. This information can also be provided as part of the ECPA plans rather than in a Survey addendum/update.
- ii. Provide a targeted bat habitat assessment that identifies potential bat habitat trees located with the project area and extent of potential bat habitat trees within parcel.
- iii. A discussion of the quality and value of foraging and nesting habitat for special-status bird species the property and project area grasslands provide, and an analysis of potential impacts associated with the loss of foraging and nesting habitat due to the conversion of grassland to vineyard.
- iv. Confirmation that all seasonal wetlands have been mapped. Based on the site inspection it appears that wetlands may be located within norther portion of Vineyard Block 7A above the large gully that has formed in the last 7 to 10 years located along the western periphery of Vineyard Block 7A.

**Please refer to the supplemental biological response memorandum prepared by WRA dated September 26, 2019.**

- b. Vineyard Development and Operations Traffic and Practice: In addition to the information provided in Application *Attachment A*, please provide anticipated truck and vehicle trips, equipment necessary, and number of employees necessary for, land preparation, erosion control plan installation (including importation of, soil amendments or other materials), vineyard installation, and ongoing vineyard operations. Furthermore, because this is an expansion to the existing vineyard being operated on-site, please identify if existing employees associated with existing operations are anticipated to be utilized to install and operate the proposed vineyard. This information is necessary to disclose and assess potential traffic, air quality, and climate change impacts associated with project development and operational activities.

**Estimated Vineyard Construction trips:**

**12 worker trips per day**

**6 equipment deliveries (once at start of construction, one at end)**

**Estimated Vineyard Operation trips:**

**12 worker trips during harvest**

**4-8 grape truck trips during harvest**

**The 12 workers required during construction and operation of the vineyard would be in addition to those that currently work on the property.**

- 3. Notification Information/Listing:** A listing of the current owners of all the properties located within 1,000 feet of the project site/holding will be necessary to circulate the CEQA document for public review and comment. The notification information shall include the property owner's names, their addresses, and the assessor's parcel numbers of the property owned. Also see the enclosed *Adjoining Property Owner List Requirements* instruction sheet. You will be advised when the notification information will need to be provided.

**Noted. This information will be obtained when it is requested.**

### **Response to May 14<sup>th</sup>, 2019 Memorandum from Engineering Division**

#### **Erosion Control Plan**

1. Provide additional detail and information (e.g. pipe size, slope, referenced detail, etc.) for the subsurface drain located in Block 4A.

**Please refer to Detail Sheet 7 of the revised ECP for the additional information requested regarding the subsurface drain.**

2. Provide additional detail and information (e.g. pipe size, slope, referenced detail, etc.) for the subsurface drain located in Block 9.

**Block 9 was redesigned to avoid an existing landslide. As a result of this redesign, the drainage infrastructure was not needed and therefore removed from the revised ECP.**

3. During the recent site reconnaissance in April 2019, a recent landslide/slope failure occurred just east of Block 4A at an existing culvert. Please address the remediation as part of the plan.

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019.**

4. During the recent site reconnaissance in April 2019, a large gully channel was observed west of Block 7A; please address the remediation as part of the plan.

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019.**

5. Revise the plan to identify the setback from all identified landslide areas as recommended in the Gilpin Geologic Analysis, specifically Block Complexes 4, 5, 6 and 7.

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019, which now includes more robust descriptions and details for the repair of onsite landslides. The ECP has been revised in the location of each mapped landslide to directly reference the recommendations required in the supplemental Geological and Geotechnical Evaluation. Blocks 1B, 4C, 7B, 8H and 9 were redesigned to incorporate the recommended setbacks.**

#### **Soil Loss Analysis**

6. Revise the existing cover condition for Block 2A – Based on a recent site visit in April 2019, the existing vegetative condition for proposed Block 2A shall be revised to 25% tree canopy; 80% ground cover with a 50:50 ratio of weed-like and grass-like cover vegetation.

**The existing cover condition for Block 2A has been updated to 25% tree canopy; 80% ground cover with a 50:50 ratio of weed-like and grass-like cover vegetation. Please refer to the revised Soil Loss Analysis included with this resubmittal package.**

#### **Hydrology Analysis**

7. Post-Project Analysis Watershed WS1L – please include the proposed subsurface drain in the numerical analysis.

**Per discussion with Napa County Engineering staff, the proposed drain was thought to be conveying surface water and would therefore need to be included in the Hydrologic Analysis. The proposed drain is actually a subsurface drainage line which does not convey surface water. This was acknowledged by Napa County Engineering staff and it was agreed that no revisions to the Hydrologic Analysis were required.**

#### **Road Plan**

8. Based on Review of ECPA #99230, historic aerial imagery, and recent site reconnaissance the trails east of the blue-line tributary to Carneros Creek that are proposed to provide access to Block Complexes 1, 7 and 8 where developed around 2011, and don't appear to serve an approved use on the property. Revise the Road Plan as necessary to address these trails as new access roads and provide the details

required to develop these roads and include the Best Management Practices for storm-proofed new roads.

**Road designs and slope calculations for the short segments of road between Blocks 7 and 8 and Blocks 1 and 8 have been provided in the revised Track I ECP, please refer to Sheets 8 through 11 for details. Also see Response to May 21, 2019 Completeness Determination by Napa County #P19-00069-ECPA Item 1 section f (above) for additional information.**

### **Geotechnical Evaluation**

9. Provide supplement to the Gilpin Geological Investigation, to provide additional recommendations and specifications for developing vineyard within mapped landslide areas, specifically Block 4C, 6A, 7A and 7B.

**Please refer to the supplemental Geological and Geotechnical Evaluation memo dated October 11, 2019.**



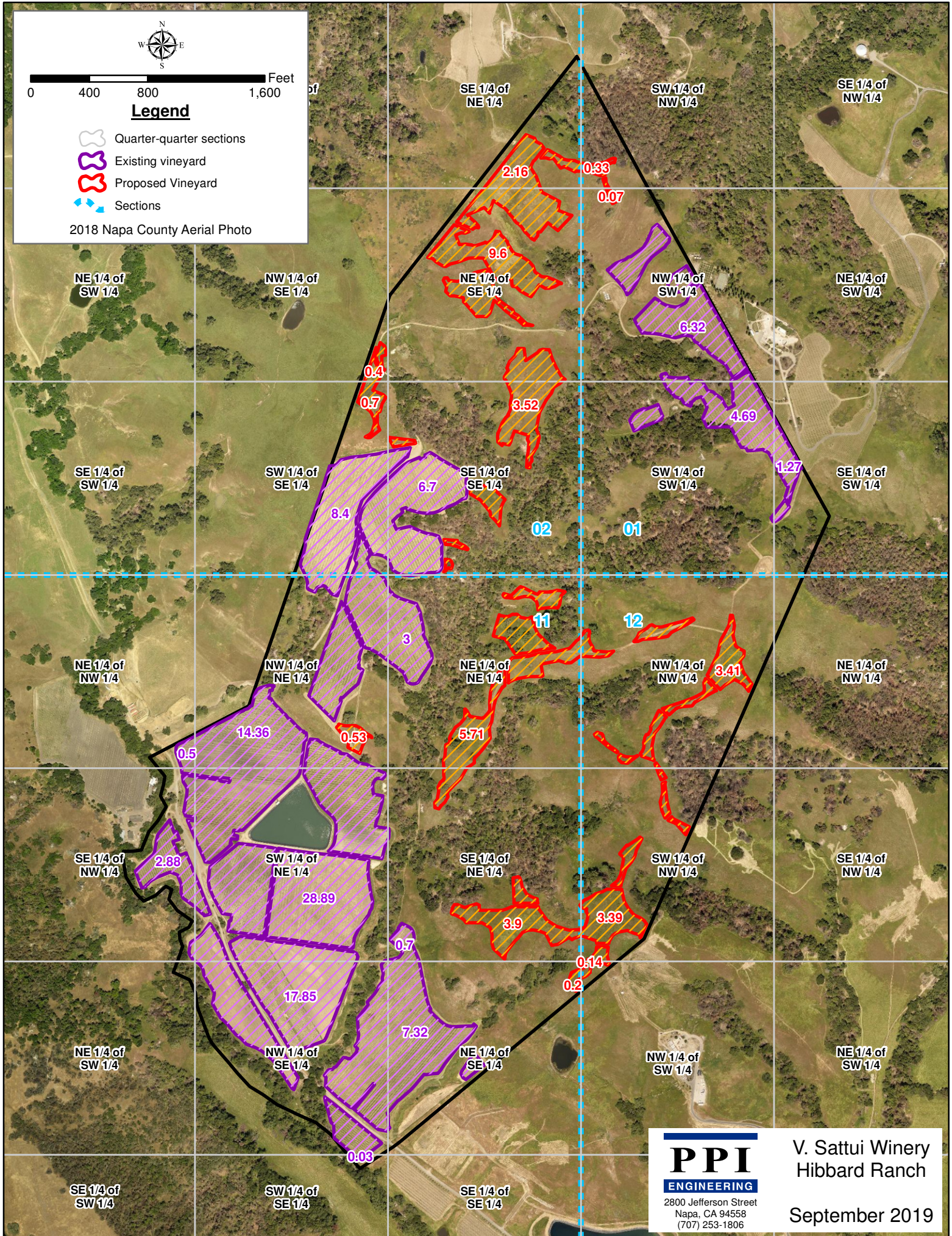


0 400 800 1,600 Feet

**Legend**

- Quarter-quarter sections
- Existing vineyard
- Proposed Vineyard
- Sections

2018 Napa County Aerial Photo





**V. SATTUI HIBBARD RANCH VINEYARD CONVERSION**  
**Response to December 4<sup>th</sup>, 2019 Completeness Determination from Napa County**  
**#P19-00069-ECPA**

**1. Agricultural Erosion Control Plan Application Completeness Items:** This information is necessary to clearly describe and understand the full extent of the proposed conversion project and adequately disclose and assess potential impacts of the project pursuant to CEQA.

- a. Project Description – Landslides: The ECPA plan states the following for the mapped landslides within proposed Vineyard Blocks 5 & 6: *Repair landslide or maintain recommended setbacks per geotechnical report...* The project plans will need to be revised to identify which action is being proposed as part of the project. Additionally, the project's hydrologic analysis will need to take into account any subdrains that will be installation to repair slide areas.

**The ECP has been revised to show which landslides will be repaired and which will be avoided. The eastern slide in Block 6 will be avoided, but the other two slides in Block 6 and the one slide in Block 5 will be repaired pursuant to recommendations within the Geotechnical Report. There are several other slips on the property that are outside of the proposed vineyard blocks; appropriate setbacks have been maintained as shown on the revised ECP plans. The revised Geotechnical Report has been added as Appendix F in the revised ECP.**

**Subdrains will not be added to the hydrologic analysis per a meeting with the County Engineering Manager on January 27, 2020.**

- b. Project Description – Water Supply System: It is indicated that irrigation lines will be located within existing ranch roads. Based on the location of the reservoir, the primary source of irrigation for the project, and existing roads there may be up to 2,500 feet of new primary irrigation lines and connections to existing main irrigation lines that will supply the proposed vineyard: irrigation layout within proposed vineyard blocks is not necessary for application or CEQA review. Trenching to install new irrigation lines for a new agricultural use is not exempt from the Conservation Regulations; therefore, irrigation lines located within creek setbacks will require the submittal of a use permit exception application.

**A new Figure 6 has been added to the revised ECP to disclose the existing irrigation mainlines and the proposed irrigation mainlines on the ranch. The existing irrigation mainline network within existing roadways is sufficient to provide irrigation water to proposed Blocks 2 through 6 and Block 9. One short stretch of proposed irrigation mainline will be required to bring water**

**to proposed Blocks 1, 7, and 8. The proposed irrigation mainline shown in Figure 6 will be located within an existing roadway located south of an existing vineyard block in the northeastern portion of the property and enters proposed Block 8A. This existing road is shown as an access road in approved ECP #99230-ECPA. The proposed pipeline route shown in Figure 6 is located outside of all stream or wetland setbacks.**

- c. Project Description – Road Improvements: Due to the increase in the intensity and frequency of use placed on existing roads to develop and operate the vineyard project (including installation location of new main irrigation lines), and to provide adequate vineyard access, necessary road improvements are anticipated to extend outside the limits of existing roadbeds. While the plans homogeneously describe existing road widths as 10 feet existing road widths range from  $\pm 6$  feet to  $\pm 10$  feet based on the April 11, 2019 site inspection, the road cross sections in plan Sheets 8 and 10 show typical vineyard access roads may need to be up to 12 feet wide. Therefore, the Road Plan (ECPA Appendix D) will need to be updated to describe all grading and improvements necessary to existing roads to provide adequate vineyard access. This information is necessary to determine if proposed road improvements located within required stream setbacks will necessitate the submittal of use permit exception application (also see #1d.i).

**A supplemental site visit was conducted to ensure that all existing roadways on the property that are proposed for site access to the proposed vineyard blocks are a minimum of 10 feet wide. No additional widening is required for this project. This was discussed with Planning and Engineering staff during the meeting on January 27, 2020. No updates have been made to the revised ECP as a result of this comment.**

- d. ECPA Plans: Please provide revised plans or supplemental plan sheets that includes or shows the following:
- i. Required stream setbacks along mapped blue-line streams adjacent to existing roads that will be utilized for project development and operation (also see #1b and #1c).

**Setbacks along the existing roads that will be utilized for project development and operation have been added to the revised ECP. Please refer to Sheets 2 through 6 in the revised ECP included with this resubmittal package.**

- ii. Landslides and unstable areas and extent of work for all proposed repairs including locations of any subdrains (also see #1a).



**All landslides that are within (proposed for repair) or adjacent to (recommended setbacks have been maintained) proposed vineyard blocks are shown on the revised ECP plans. Any landslides that are not proposed for repair have had the appropriate setbacks maintained pursuant to recommendations in the Geotechnical Report. All landslides in which the setback has defined the proposed clearing limits are now shown on the revised plans, as requested by County staff during the January 27<sup>th</sup> meeting. Please refer to the revised ECP included with this resubmittal package.**

- iii. Location(s) of new and existing primary irrigation lines and connections to existing main irrigation lines that will supply the proposed vineyard, and the two project wells identified in the WAA (O'Connor Environmental, September 2019) (also see #1b).

**Refer to response to Item 1(b) above regarding the existing and proposed irrigation mainlines. The locations of the two existing wells have been added to the site plan in the revised ECP.**

- iv. Confirmation of proposed Deer Fencing: Figure 4 of the ECPA does not appear to show proposed fencing for Blocks 7 and 8.

**Figure 4 in the last ECP submittal erroneously did not include one fencing cluster; it has been updated to show all proposed deer fence. Please refer to the revised ECP included with this resubmittal package.**

- e. Geotechnical Report: Please provide clarification or confirmation on the following items in Engineering Geotechnical Evaluation update/addendum (Gilpin Geosciences, October 2019):
  - i. Clarification of Sections L-L and P-P. Figure 5A indicates the erosional gully cross section is L-L but Figure 5B indicates P-P.
  - ii. Clarification of the references to the Keyway identified in figure 3A: the figure note references Figure 8, however Figure 8 is the Subdrain Detail.
  - iii. Confirmation that the effects and any changes in sediment delivery amounts based on the project including changes in the amount of sediment delivered to drainageways as compared to existing conditions as compared to existing conditions, and any potential impacts and threats to both on and off site aquatic resources and streams as a result of the project has been described and assessed in the reports.

**The Geotechnical Report has been revised to correct the above-noted items. The revised Geotechnical Report is now included as Appendix F in the revised ECP included with this resubmittal package.**

- f. Water Availability Analysis (O'Connor Environmental, September 2019): Please provide clarification/confirmation that on page 10 under proposed use that 1.3 acres will be irrigated with groundwater, the second sentence indicates that 1.3 acre-ft/yr will be irrigated using groundwater.

**Correct, only 1.3 acres will be irrigated with groundwater. This typo has been corrected in the revised Water Availability Analysis included with this resubmittal package.**

- g. Shape Files: Please provide the Biological Communities and Updated Land Cover and Tree Survey GIS shapefiles from the Biological Resources Reconnaissance Survey Report and Response to Comments (WRA Environmental Consultants, December 2018 and September 2019), and Landslide shape files from the Engineering Geotechnical Evaluation and Response (Gilpin Geosciences March and October 2019).

**These shapefiles have been provided electronically with this resubmittal package.**

### **Email from Don Barrella dated February 28, 2020**

I am presuming you have reviewed the other ECPAs on this property as they relate to access roads: they are attached for your reference. With that in mind, the pending plan indicates that there is an existing network of +5.1 miles of roads for access to proposed vineyard blocks, which implies all the roads shown on the pending plan will be utilized, which is the assumption I am working under: but as you have noted below [email correspondence from Annalee Sanborn dated February 25, 2020] all the roads shown may not be utilized. This assumption/inconsistency (or lack of clarity) may affect the ability to develop a concise project description. Additionally, it would appear that a +450 foot stretch of road and irrigation line leading from the NE corner to blocks 1, 7, and 8, that is located well away from any stream or watercourse, would result in less disturbance and impacts than a +1,300 foot stretch of road and irrigation line located immediately adjacent to a blue-line stream.

**The Applicant wishes to retain the right to utilize all existing roads on the property for project access. As noted in the email from Annalee Sanborn dated February 25, 2020, the landowner in practice may not have the need to utilize the northernmost road very often. However, this access road is shown as an existing, legal access road in approved ECP #99230-ECPA, and is continued to be shown as an existing road on the Road Plan provided**

**in Appendix D of this ECP and in Element 5 (Road Plan) of the Farm Plan prepared for the property by Fish Friendly Farming. Please include all roads on the property in the project description prepared for this ECP.**