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14 Attorneys for Petitioner

15 THE SUPERIOR COURT OF CALIFORNIA
16 COUNTY OF NAPA

17 SODA CANYON GROUP;

18 Petitioner,

19 vs.

20 COUNTY OF NAPA; NAPA COUNTY
21 BOARD OF SUPERVISORS; and
22 DOES 1 through 10, inclusive,

23 Respondents

24 MOUNTAIN PEAK VINEYARDS, LLC;
25 ERIC YUAN; HUA YUAN; and DOES 11
26 through 20, inclusive,

27 Real Parties in Interest.

Case No.: 17CV001063

**DECLARATION OF AMBER
MANFREE IN SUPPORT OF THE
MOTION TO AUGMENT THE
ADMINISTRATIVE RECORD**

[CEQA Matter]

Date: January 11, 2019

Time: 8:30 am

Dept.: I

Action filed: September 20, 2017

28 I, Amber Manfree, declare as follows:

1 1. I am over the age of 18, and am a not a party to this action. However, I testified at
2 public hearings conducted in this matter on July 20, 2016, January 4, 2017, and May 23, 2017, and
3 am thus aware of the facts and circumstances surrounding this matter

4 2. Except as otherwise qualified below, I have personal knowledge of the facts set
5 forth in this declaration, and if called today as a witness, I could and would testify competently as
6 to such matters set forth herein.

7 3. I hold a doctorate in Geography (UC Davis 2014), a Master’s degree in Geography
8 (UC Davis 2012), a Bachelor’s degree in Environmental Studies (Sonoma State, 1999), and a
9 certificate in Geographic Information Systems (Santa Rosa Junior College 2009).

10 4. Attached as **Exhibit 6** to the Declaration of Anthony Arger (“Arger Decl.”) is a
11 full and current copy of my curriculum vitae.

12 5. My specialties are Landscape Change Geography, Cartography, and Spatial
13 Analysis. I have worked with geospatial software since 2006. I have extensive field research
14 experience related to water quality, hydrology, and aquatic organisms in Napa, Sonoma, and
15 Solano Counties. During my graduate career at UC Davis, I excelled in coursework in spatial
16 science, biology, hydrology, and wetland science.

17 6. Included with **Exhibit 5** attached to the Arger Decl. is a map entitled Soda
18 Canyon Road Regional Fires Map (“Regional Fires Map”) that I created.

19 7. The Regional Fires Map is a thematic map I made using ArcGIS software. It
20 shows fire boundaries for burns recorded in the FRAP Fire Perimeters GIS dataset released in
21 2018. This dataset is maintained by CAL FIRE (including contract counties), USDA Forest
22 Service Region 5, USDI Bureau of Land Management & National Park Service, and other
23 agencies jointly.

24 8. Fire perimeters for fires 10 acres and greater on public and private lands in
25 California, dating back to 1878, are contained in this GIS layer file. Data documentation states
26 that this dataset is an under-representation of actual fires saying, “Some fires may be missing
27 because historical records were lost or damaged, were too small for the minimum cutoffs, had
28 inadequate documentation or have not yet been incorporated into the database. Due to missing

1 perimeters, this layer should be used carefully for statistical analysis and reporting as it is not a
2 complete record.” Data generation methods vary according to the time of creation. They may
3 have been hand drawn at the time of the fire and scanned and digitized later, traced in a digital
4 environment over aerial imagery, or automated. Supplemental data include roads and waterways,
5 datasets which are maintained by Napa County, elevation data maintained by US Geological
6 Survey (USGS), and the Soda Canyon Road Service area, which I created by assessing road access
7 to individual parcels and generating a boundary based on parcel edges.

8 9. Included with **Exhibit 5** attached to the Arger Decl. is a map entitled Soda
9 Canyon Road Service Area Fires (“Soda Canyon Fire Map”) that I created.

10 10. The Soda Canyon Road Service Area Fires Map is very similar to the Soda Canyon
11 Road Regional Fires Map. It uses the same data and map making techniques. The differences are
12 (1) it only shows fire perimeters that intersect the Soda Canyon Road service area, so that fire
13 frequency in the immediate area can be considered in isolation, (2) the zoom level is closer, and
14 (3) fire area representations use hash symbols so overlap is apparent.

15 11. Included with **Exhibit 5** attached to the Arger Decl. is a map entitled the Soda
16 Canyon Road Damage Assessment Map (“Damage Assessment Map”) that I created.

17 12. The Damage Assessment map is a thematic map I made using ArcGIS software. It
18 shows the spatial distribution of structure damage caused by the 2017 Atlas Fire in the Soda
19 Canyon Road service area. Primary datasets include two datasets maintained by Napa County (1)
20 damage assessments made following the October 2017 Atlas Fire and structure and (2) address
21 data documenting houses or other structures with addresses (prior to the fire).

22 13. In the Damage Assessment Map, property damage is represented by red dots for
23 unsafe or destroyed buildings or yellow dots for buildings considered “cautionary” due to lesser
24 fire damage. As per Napa County Information Technology Services Department (ITS), damage
25 assessment data were collected in three ways: (1) site inspections by Napa County inspection
26 teams (local inspectors, code enforcement officers, and mutual aid inspectors from outside
27 agencies); (2) damage assessment information from CalFire DINS data (not a direct copy, but
28 used for reference); and (3) aerial photo interpretation of pre- and post-burn imagery of parcels

1 that couldn't be reached by inspection teams. Napa County ITS compiled site assessment
2 information in a spatial dataset. The product is freely available to the public and may be accessed
3 at the Napa County Geographic Information Systems (GIS) Data Catalog website.

4 14. Address data shown in the Damage Assessment Map as small black dots are
5 maintained by Napa County ITS and show address and sub-address points in the county using
6 the official road name. Address data does not include retired addresses. Supplemental data
7 include roads and waterways, datasets also maintained by Napa County, the perimeter of the
8 2017 Atlas Fire, documented by California Fire Resource and Assessment Program (FRAP),
9 elevation data maintained by US Geological Survey (USGS) and the Soda Canyon Road Service
10 area, which I created (described above).

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed this 12th day of October, 2018 at Davis, California.

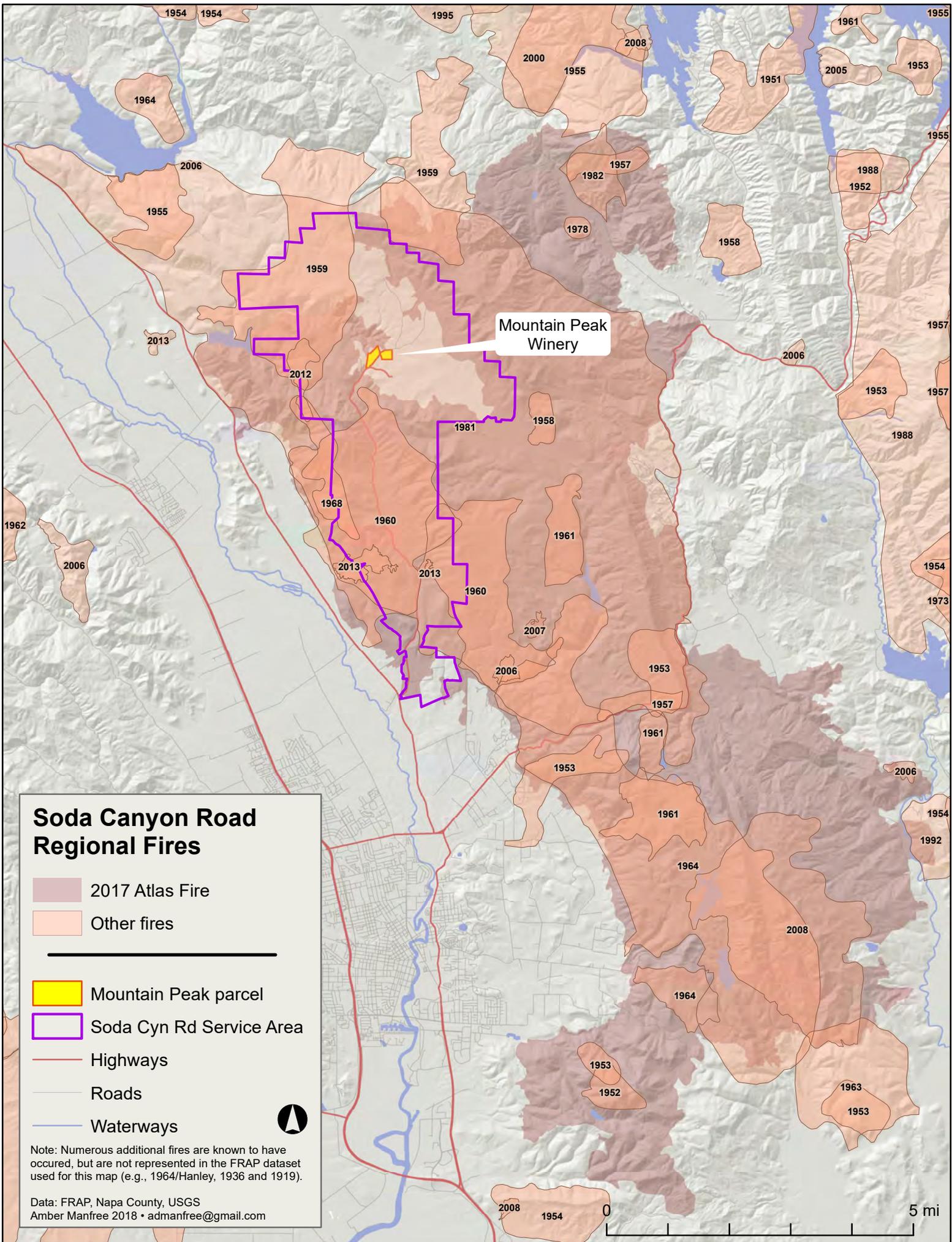
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16 Amber Manfree, PhD
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EXHIBIT “5”

EXHIBIT “5”

EXHIBIT “5”



Mountain Peak Winery

Soda Canyon Road Regional Fires

- 2017 Atlas Fire
- Other fires

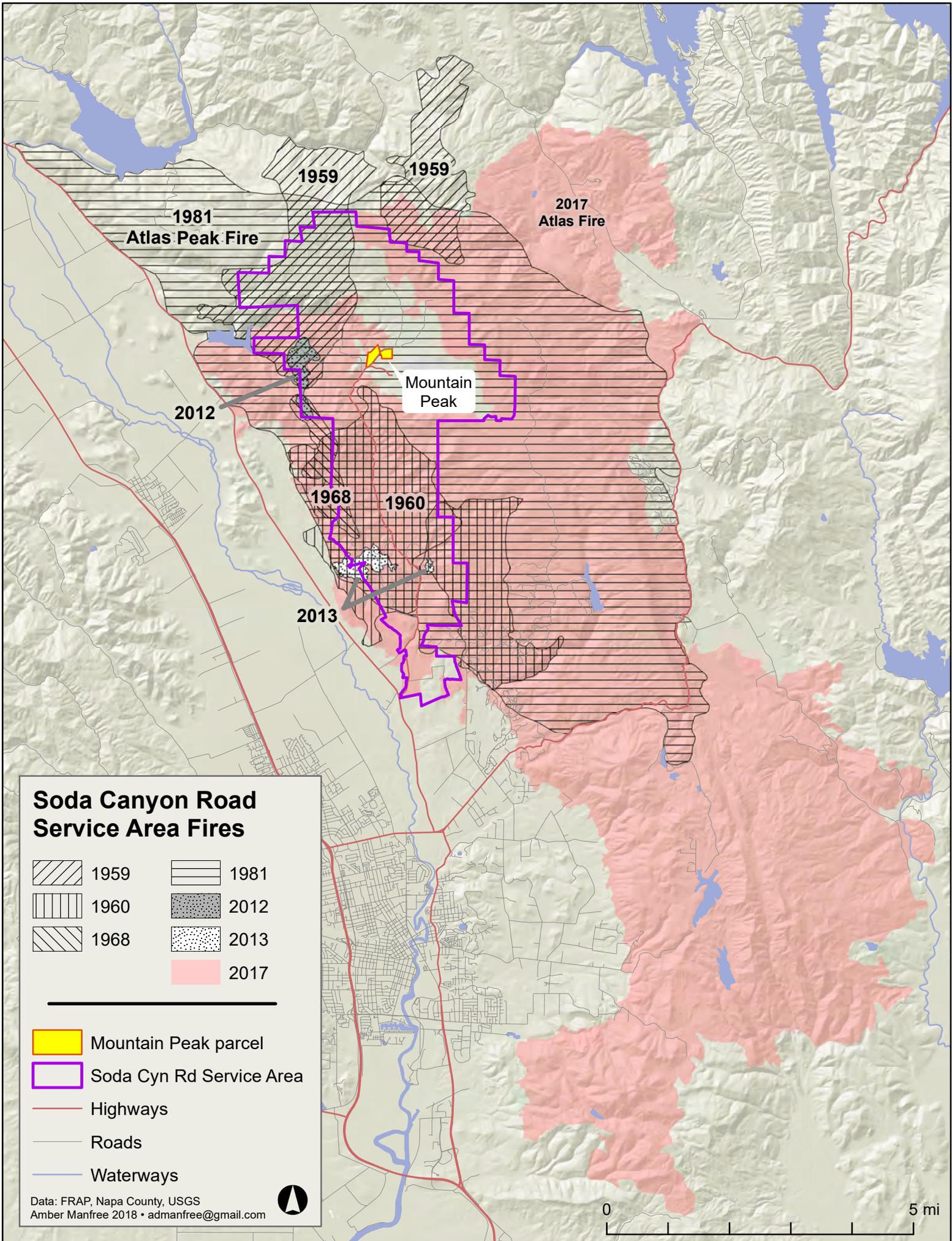
- Mountain Peak parcel
- Soda Cyn Rd Service Area
- Highways
- Roads
- Waterways

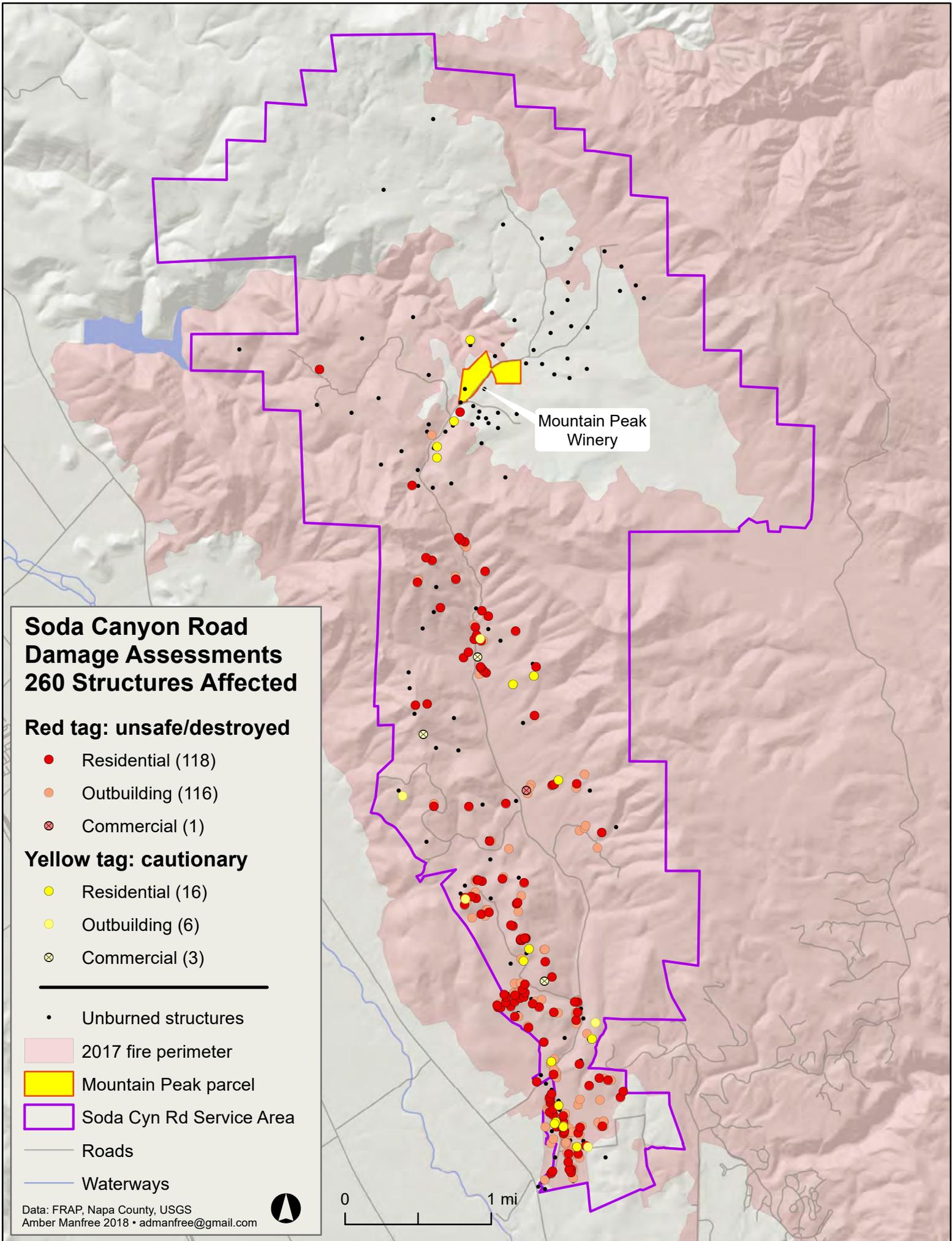


Note: Numerous additional fires are known to have occurred, but are not represented in the FRAP dataset used for this map (e.g., 1964/Hanley, 1936 and 1919).

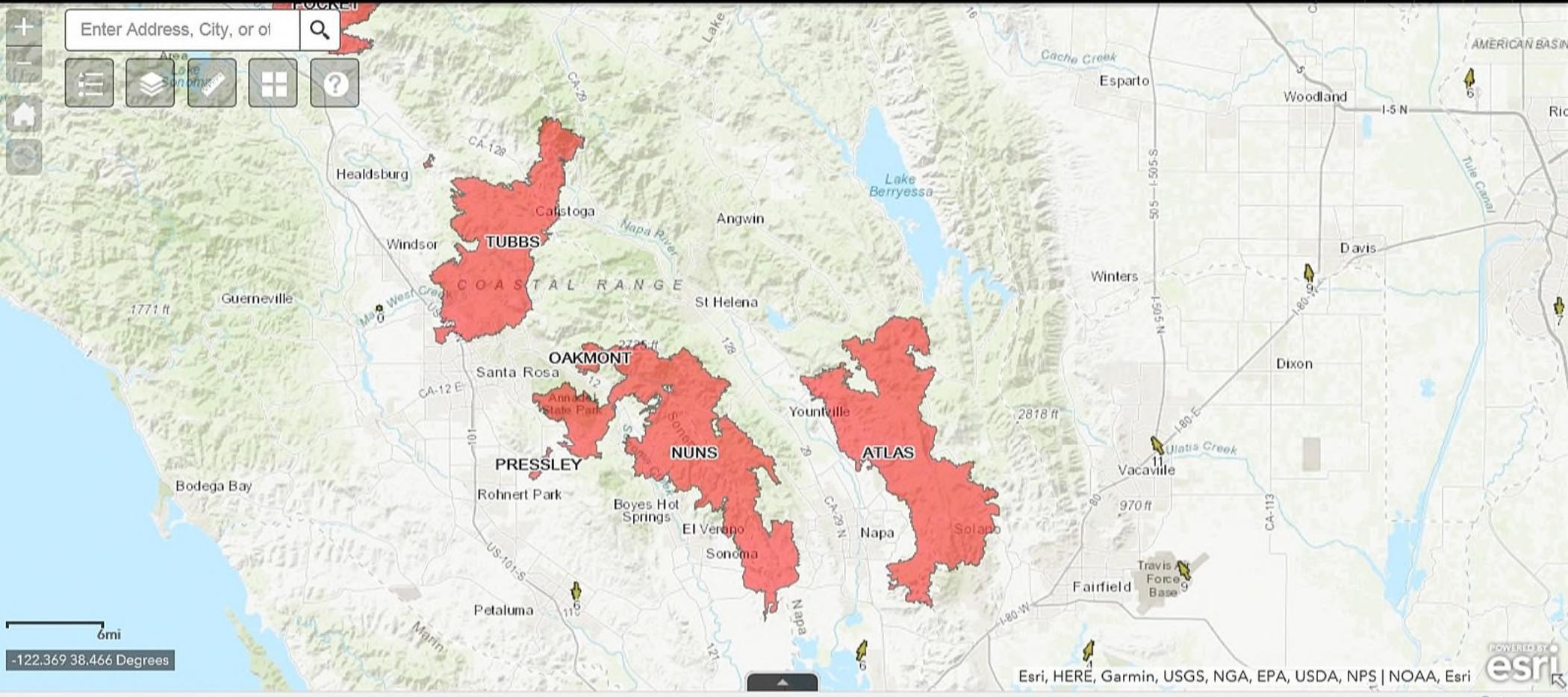
Data: FRAP, Napa County, USGS
 Amber Manfree 2018 • admanfree@gmail.com

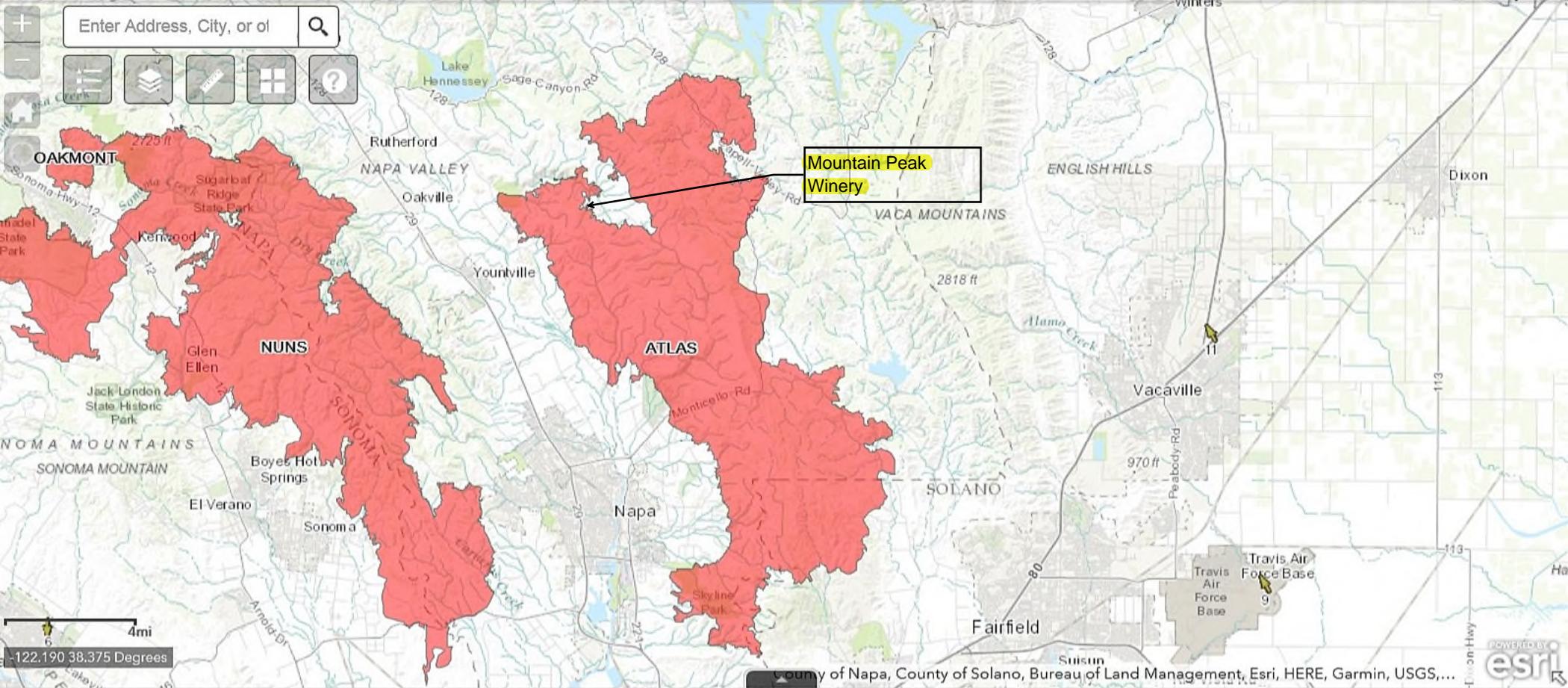
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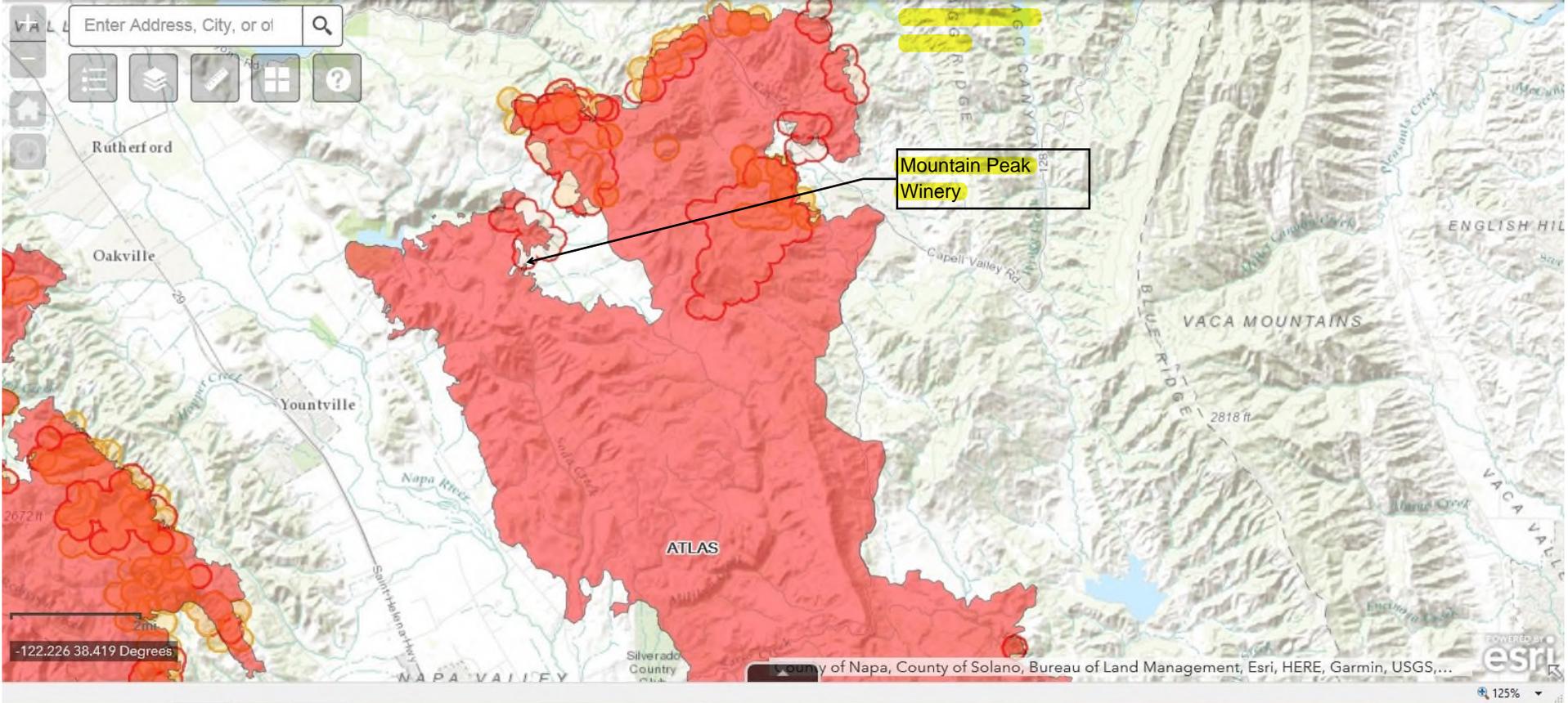


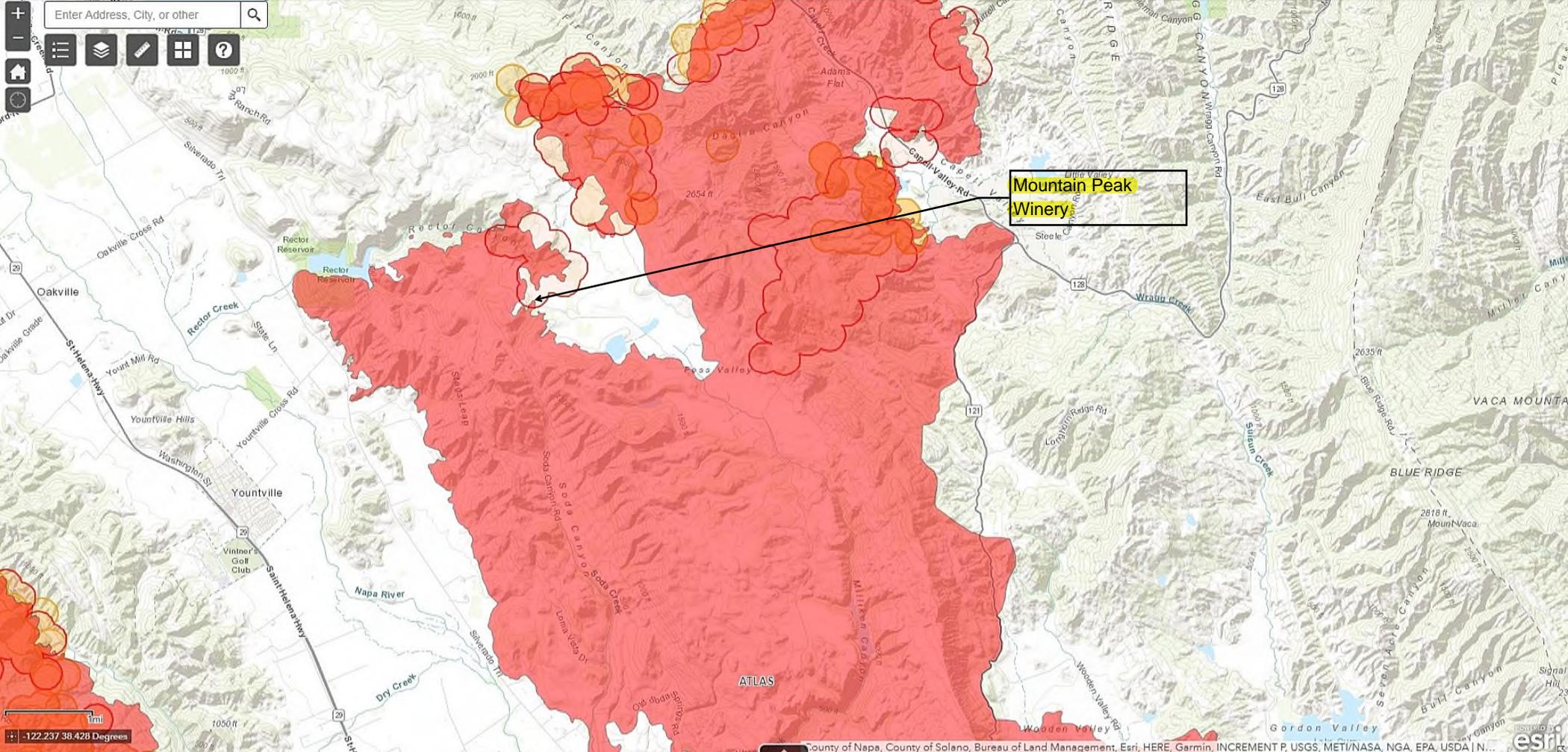
FRAP LNU and Mendicino-Lake Complexes October 17, 2017

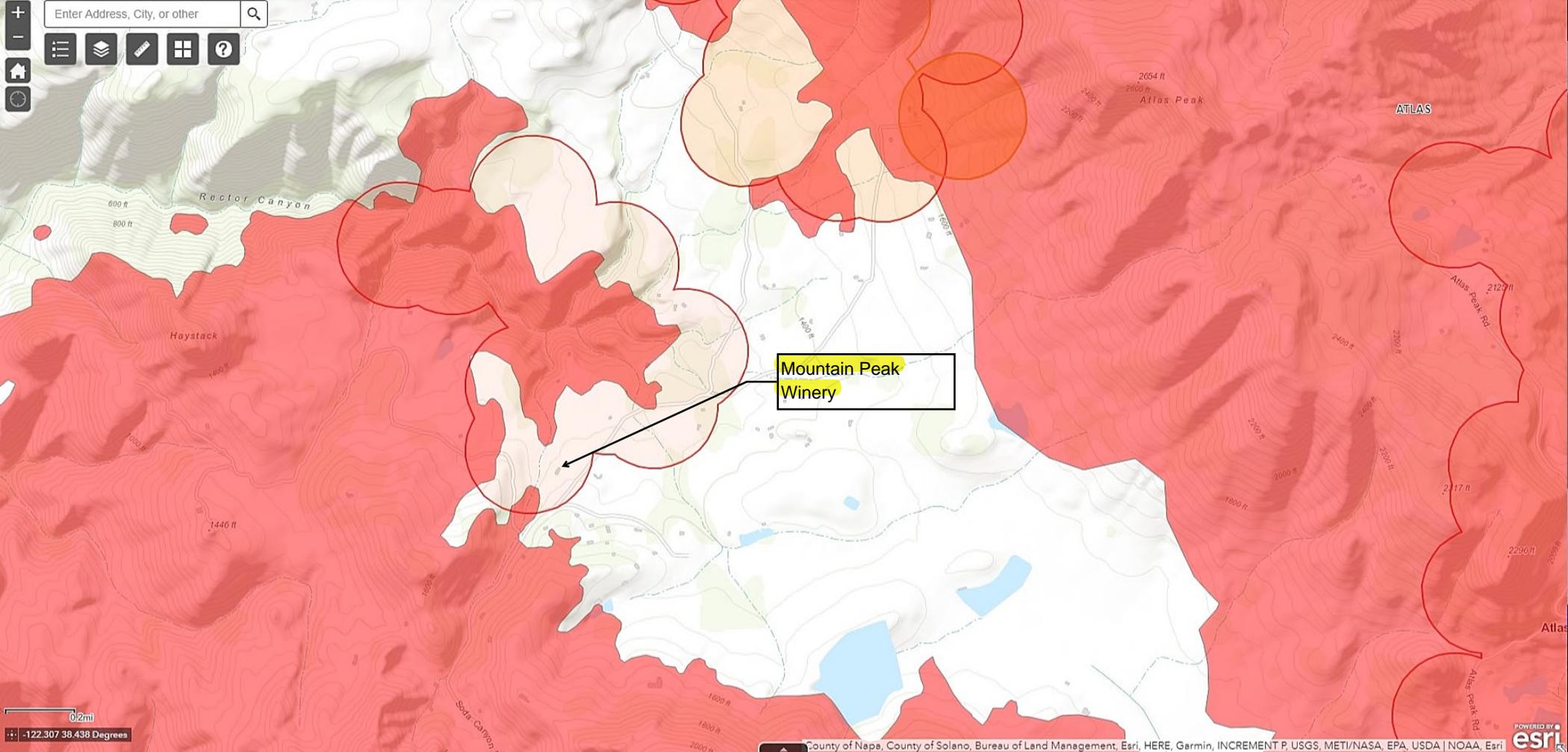




-122.190 38.375 Degrees







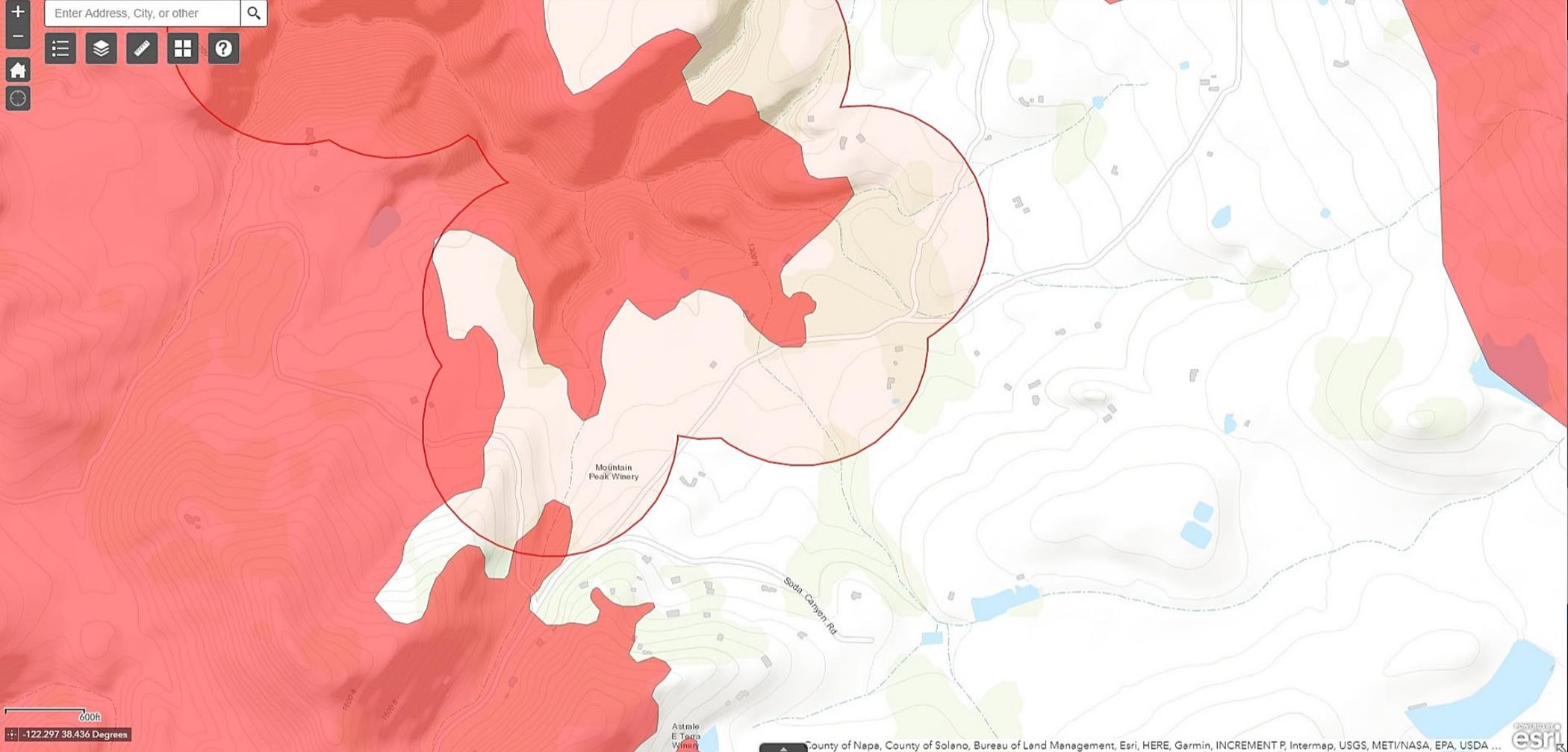
Mountain Peak Winery

0.2mi
-122.307 38.438 Degrees



Enter Address, City, or other

Map navigation controls: zoom in (+), zoom out (-), home, and refresh.



Atlas Incident Southern LNU Complex CALNU 010046 Damage Inspection Report



October 25, 2017
Revised October 21, 2017

Submitted by:

Andrew Henning, Damage Inspection Specialist
Tiffany Meyer, GIS Specialist
Carmel Mitchell, Damage Inspection Specialist
Josh Gibson, Damage Inspection Specialist

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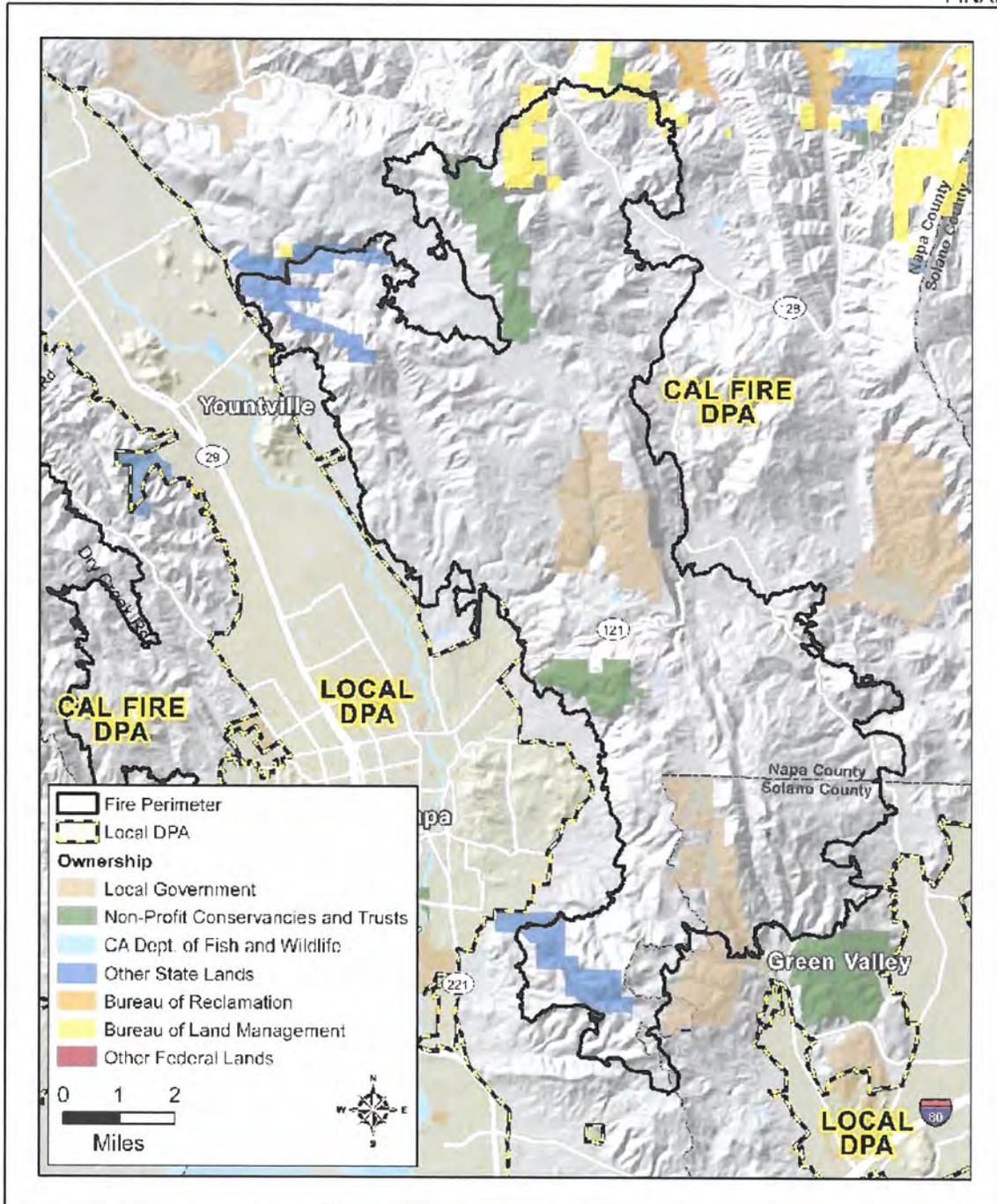
APPENDIX B: MAPS

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OWNERSHIP MAP



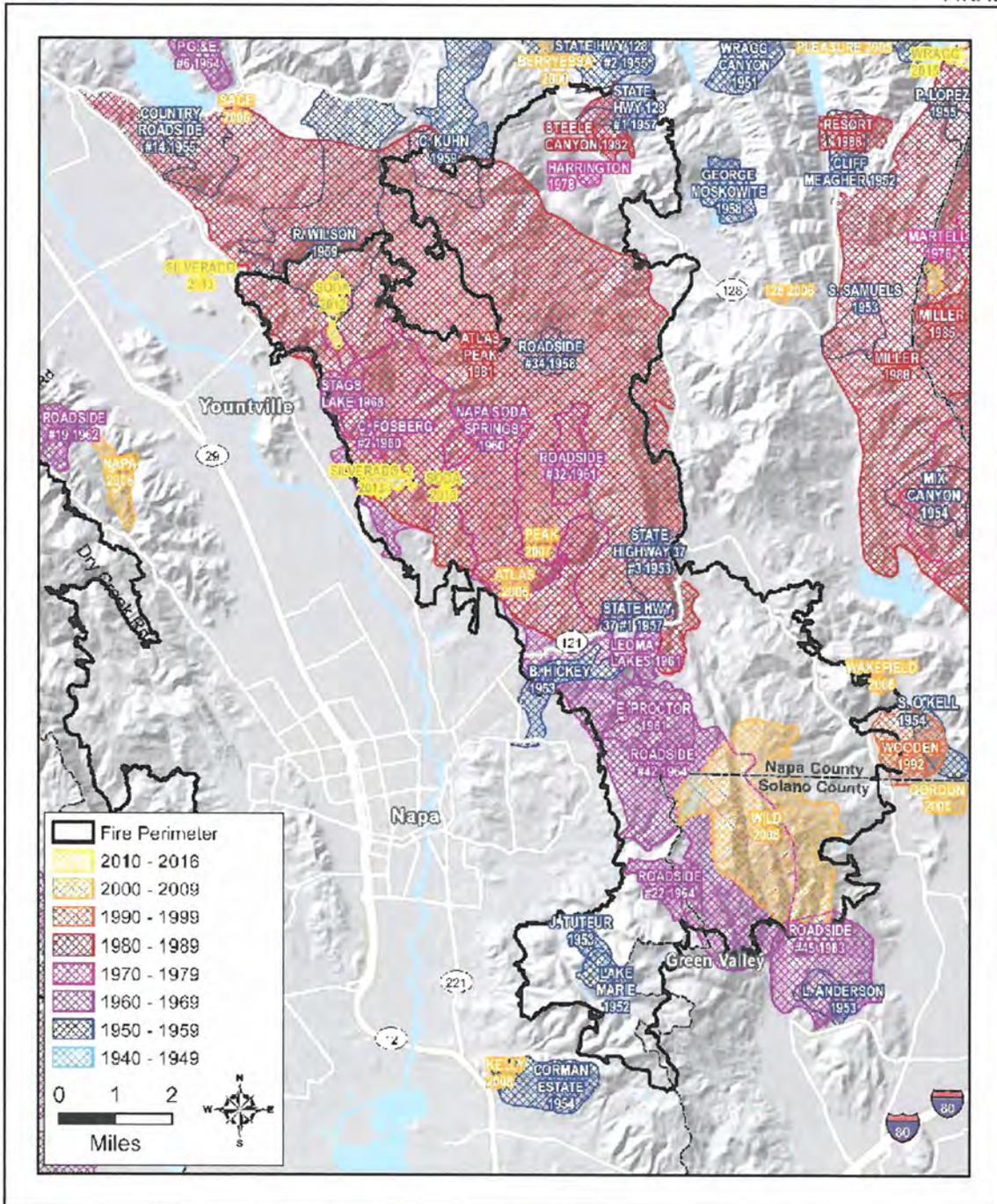
Ownership Map
SOUTHERN LNU COMPLEX
Atlas Fire
CA-LNU-010105
FINAL



FIRE HISTORY MAP



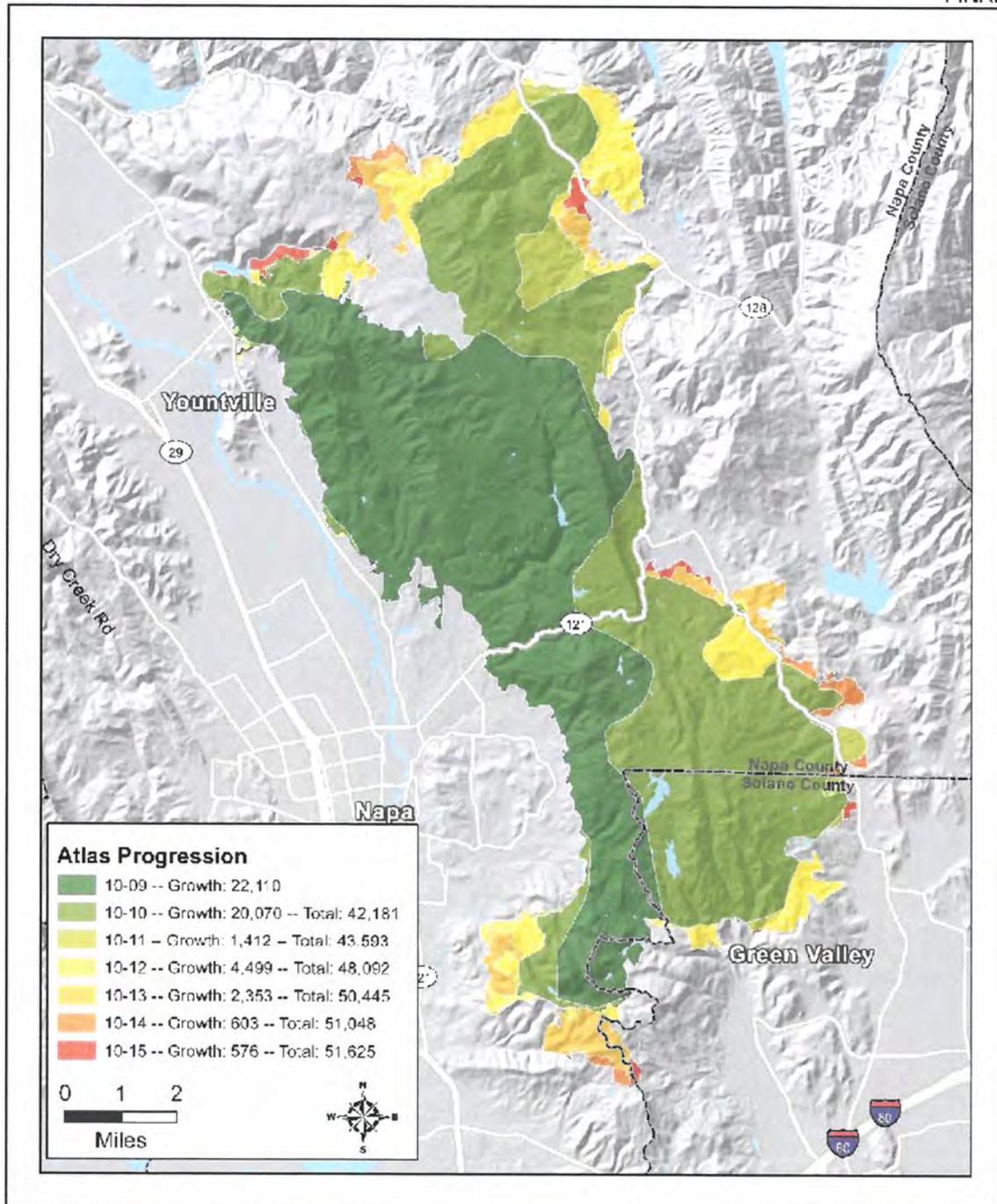
Fire History Map
SOUTHERN LNU COMPLEX
Atlas Fire
 CA-LNU-010105
 FINAL



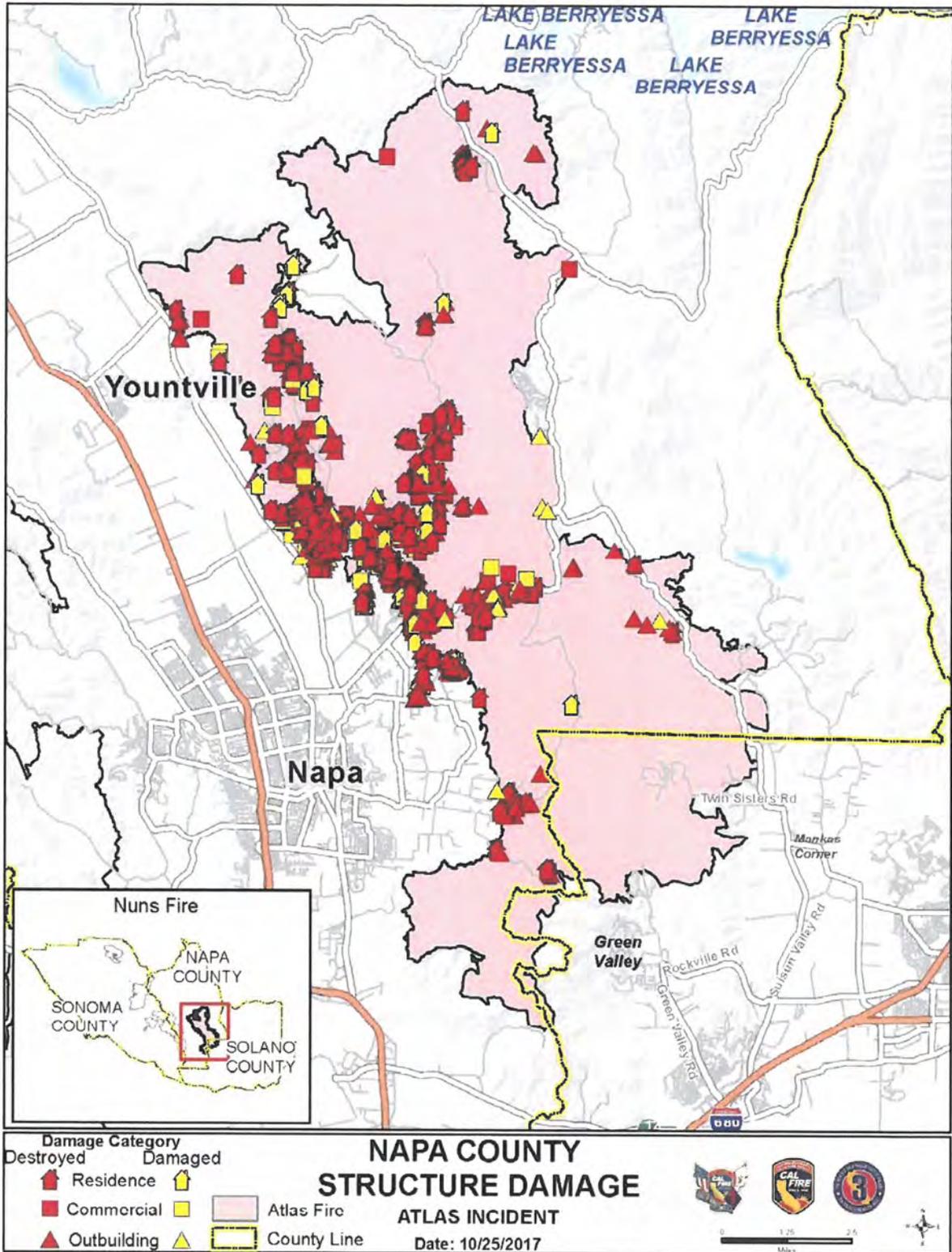
FIRE PROGRESSION MAP

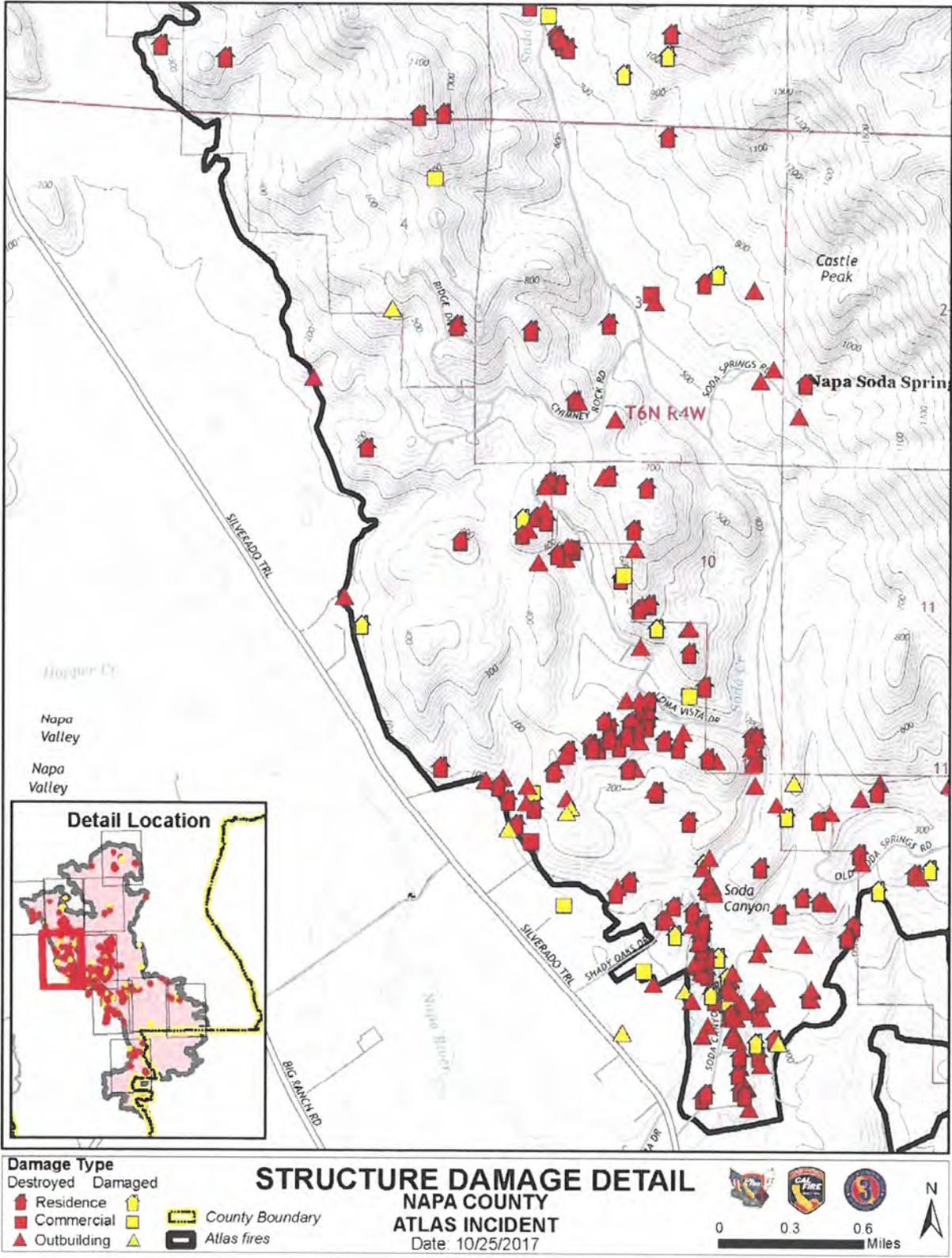


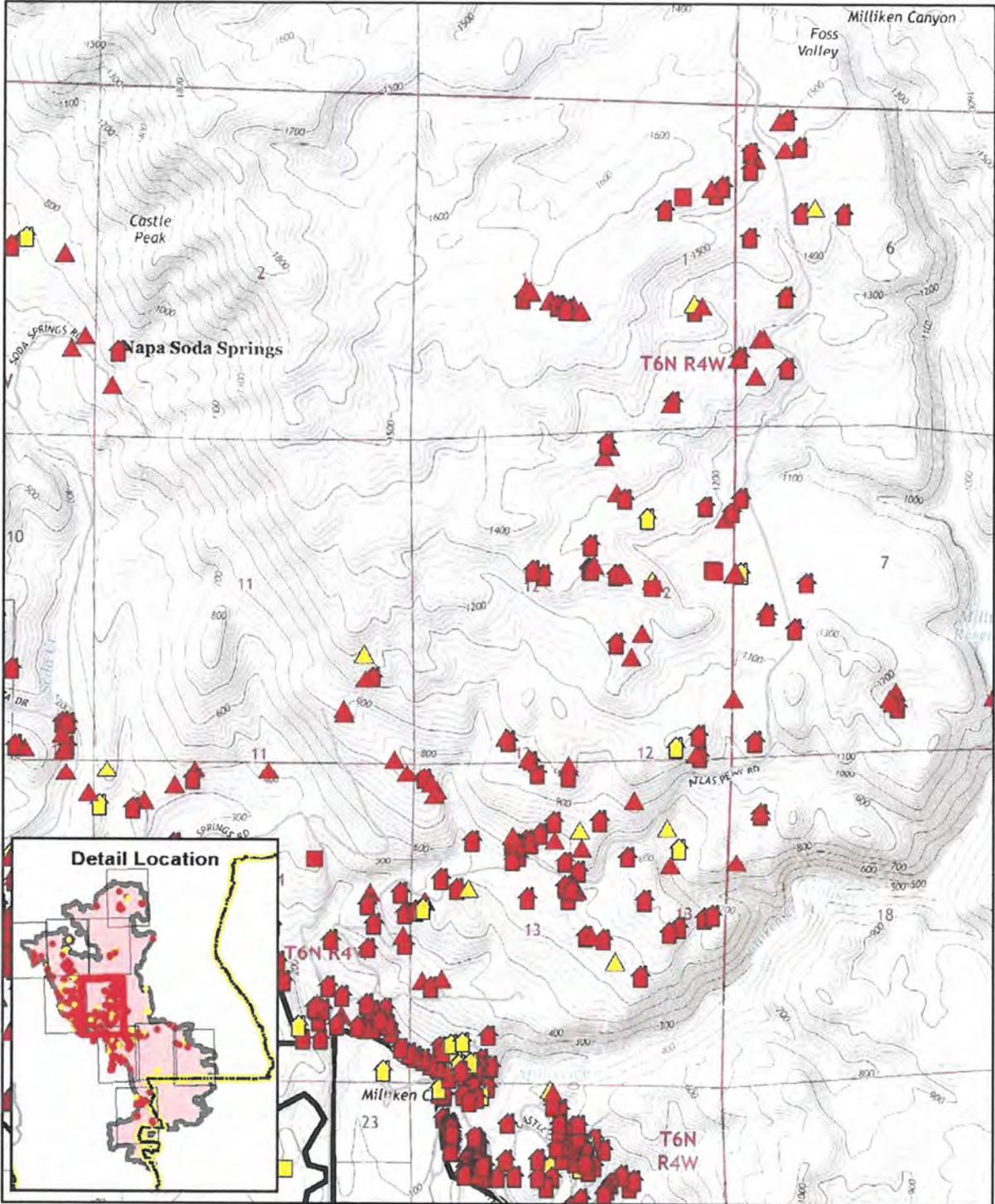
Fire Progression Map
SOUTHERN LNU COMPLEX
Atlas Fire
 CA-LNU-010105
 FINAL



NAPA COUNTY DAMAGED AREA MAPS







Damage Type

Destroyed	Damaged		
Residence	Commercial	County Boundary	Atlas fires
Outbuilding	Commercial		

STRUCTURE DAMAGE DETAIL
 NAPA COUNTY
 ATLAS INCIDENT
 Date: 10/25/2017

0 0.3 0.6 Miles

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EXHIBIT “6”

EXHIBIT “6”

EXHIBIT “6”

Amber D. Manfree
admanfree@ucdavis.edu

Center for Watershed Sciences
University of California, Davis
707.758.0107

3360 Soda Canyon Road
Napa, California 94558

Education

Ph.D., Geography, University of California, UC Davis, September 2014.
Dissertation: Landscape Change in Suisun Marsh
Advisor: Dr. Peter Moyle

Master of Arts, Geography, UC Davis, December 2012. Specialty in GIS and Geographic Techniques,
minor in Plant Ecology
Advisor: Dr. Peter Moyle

Geographic Information Systems (GIS) Competency Certificate, Santa Rosa Junior College, 2009.

Bachelor of Arts, Environmental Studies, Sonoma State University, September 1999. Emphasis in
Media Studies.

Research Experience

Postdoctoral research, UC Davis, 2014 - 2018. Research in ecological effects of drought in the
Sacramento-San Joaquin Delta. Research in Floodplain Ecology and fish ecology in Suisun Marsh.

Doctoral Research, UC Davis, 2012 - 2014. Read and synthesized historical record for Suisun Marsh,
described 200 years of landscape change based on the anthropological record, explorers journals,
the map record, and other sources. Designed animated maps to communicate content of the Suisun
Marsh Fish and Invertebrate Study dataset.

Masters Research, UC Davis, 2006 - 2012. Characterized hydrogeomorphic change in Suisun Marsh
based on the map record and other sources.

Research Assistant, Center for Watershed Sciences (CWS), UC Davis, 2011 - 2014. Editing,
cartography, and graphic design for Suisun Marsh: Ecological History and Possible Futures (book)
and California Drought Summit program. Microsoft Access database management and GIS support
for research and CWS publications.

Research Assistant, Landscape Analysis and Systems Research Laboratory, UC Davis, 2006 - 2011.
Modeled landscape-scale impacts of water use patterns in residential neighborhoods.

Professional Experience

Event Planning - California Drought Summit, April 2014. Participated throughout event planning
process and designed promotional materials.

Facilitation - extensive experience in meeting facilitation for non-profit and academic organizations, 1998 - present.

Field Technician and GIS Analyst - Laguna de Santa Rosa Foundation, 2005 - 2007. Lead Field Technician in landscape-scale invasive aquatic weed management program with duties including studies of treatment effectiveness, water quality monitoring, and volunteer recruitment and training. Trained coworkers, wrote field manual, produced maps, managed data, and maintained GPS equipment.

Teaching Experience

Instructor

Introduction to GIS, 2017 and 2018 courses for the UC Davis Extension
GIS for Watershed Analysis, 2018 course for the UC Davis Extension
Communicating with Maps, 2018 course for the UC Davis Extension
GIS Methods for Hydrology, Spring 2016 and Summer 2014
Practical GIS for Field Research, Fall 2012 and Spring 2013

Teaching Assistant

Introduction to Geographic Information Systems, Fall 2011
Site Ecology for Landscape Architects, Spring quarters 2007 - 2010
History of Landscape Architecture, Winter 2007

Curriculum Development

Led development of GIS curriculum plan for undergraduate studies at UC Davis; effort sponsored by James Quinn at the UC Davis Information Center for the Environment, Fall 2009

Guest Lectures

Careers in GIS. September, 2018. Invited by Professor Alison McNally to lecture undergraduate students at Cal-State Stanislaus.

How Historical Ecology informs our Sense of Place. July, 2017. Invited by instructor Sahoko Yui to lecture to UC Berkeley Landscape Architecture students about applying historical research to Landscape Design.

What does it mean to design with nature? November, 2012. Invited by Dr. Claire Napawan to lecture to UC Davis Landscape Architecture students in introductory course. Lectured on environmental ethics, landscape change geography, and reconciliation ecology.

GIS, GPS, and Cartography. June 2012. Napa Valley Personal Computer Users Group.

Genetics and Evolution for Landscape Architects, Spring 2010. Guest lecture to students in Site Ecology for Landscape Architects.

Publications

Opperman, Jeffrey J., Peter B. Moyle, Joan L. Florsheim, Eric W. Larsen, and Amber D. Manfree. Floodplains: processes and management for ecosystems. UC Press, Berkeley, (2017).

Baumsteiger, Jason, Robert E. Schroeter, Teejay A. O'Rear, Jonathan D. Cook, Amber D. Manfree and Peter B. Moyle. Factors affecting distribution and abundance of a trio of invasive Black Sea jellyfish in San Francisco Estuary, California. PLOS ONE (in Press).

Manfree, A. D. Napa County strings together a 'living' river. July 2015. California WaterBlog, UC Davis Center for Watershed Sciences. <http://californiawaterblog.com/2015/07/29/napa-county-strings-together-a-living-river-2/>

Moyle, P. B., Amber D. Manfree, and Peggy L. Fiedler, editors. 2014. Suisun Marsh: Ecological History and Possible Futures. UC Press, Berkeley, CA.

A. D. Manfree *in* Moyle, P. B., Amber Manfree, and Peggy L. Fiedler, editors. 2014. Historical Ecology of Suisun Marsh. UC Press, Berkeley, CA.

Moyle, P. B., Amber Manfree, and Peggy Fiedler. 2013. The Future of Suisun Marsh: Balancing Policy with Change. San Francisco Estuary and Watershed Science, 11(3).

Manfree, A. D. Drought journal: Search for Sierra fish goes from bad to worse. August 2014. California WaterBlog, UC Davis Center for Watershed Sciences. <http://californiawaterblog.com/2014/08/18/drought-journal-search-for-sierra-fish-goes-from-bad-to-worse/>

Manfree, A. D., and Peter Moyle. May 2014. Planning for the inevitable at Suisun Marsh. May 1, 2014. California WaterBlog, UC Davis Center for Watershed Sciences. <http://californiawaterblog.com/2014/05/01/planning-for-the-inevitable-at-suisun-marsh/>

Presentations and Posters

Manfree, A. D. Warming up to (Climate) Change. How studying landscape change can help communities adjust to a shifting environment. Presented at the 2016 Okanagan Water Board Annual Meeting.

Manfree, A. D. Exploring a long-term fish dataset with ArcGIS animation tools. Presented at the at 2015 Annual ESRI User Conference.

Manfree, A. D. The Fishes of Suisun Marsh: Exploring and Communicating 35 years of research with data animations. Presented at the at 2015 Annual California Geographical Society Conference.

Manfree, A. D. Landscape-scale aquatic reconciliation in the North Delta Arc. Presented at the 2015 Annual Meeting of the California-Nevada Chapter of the American Fisheries Society.

Manfree, A. D. Garden Nurseries and Trophic Relays: Spatial partitioning by fish size class in the Arc reflects higher juvenile recruitment and foraging success in regions of high pelagic food production. Presented at the 2015 Interagency Ecological Program Workshop.

Manfree, A. D., Peter Moyle. Thirty-Five Years of Fish Studies in Suisun Marsh: Perspectives and Animations. Presented at the 2014 8th Biennial Bay-Delta Science Conference.

Manfree, A. D. A new look at the fishes of Suisun Marsh. Presented at the 2014 Annual Meeting of the California-Nevada Chapter of the American Fisheries Society.

Manfree, A. D., Peter Moyle, Peggy Fiedler. Suisun Marsh, past and prospects: Highlights from the forthcoming book with UC Press. Presented at the 2013 11th Biennial State of the Estuary Conference.

Manfree, A. D. Suisun Marsh historical ecology: Notoriously swampy and overflowed lands. Presented at the 2012 7th Biennial Bay-Delta Science Conference.

Manfree, A. D. Historical Ecology of Suisun Marsh. Poster presented at 2011 Annual California Geographical Society Conference.

Manfree, A. D. Modeling wet and dry weather water quality in Sacramento County's urban residential areas. Presented at the 2010 Annual California Geographical Society Conference.

Manfree, A. D., A. Bale, S. Greco, L. Oki, D. Haver, J. Gan, S. Bondarenko. Modeling the effects of landscape best management practices on water quality in urban residential areas. Presented at the 2010 239th Annual American Chemical Society Conference.

Manfree, A. D., S. Greco, A. Bale. Modeling the effects of household-scale BMPs in urban residential zones. Presented at the 2009 Annual Meeting of the American Association of Geographers.

Professional Affiliations (societies)

California Geographical Society

Society for Conservation GIS

American Fisheries Society

Cartographic work

Comprehensive Conservation and Management Plan. 2016. San Francisco Estuary Partnership.

State of the Estuary Report. 2015. San Francisco Estuary Partnership.

Connolly Ranch welcome map interpretive signage. 2014. Napa Land Trust and Connolly Ranch.

The Shifting Cultural Landscape of the San Francisco Bay Area, 1772 - 1846. 2013. Self-published.

Watersheds of California. 2010. Self-published.

Community Service

Suisun Marsh Complete Marsh Project, 2017, 2018

Suisun Marsh Fish and Invertebrate Study field sampling, 2008-2016.

Bodega Bay Annual Field Survey volunteer, 2009, 2010, 2011, 2014, 2017

North Bay Fish Study (Hobbs; Napa, Sonoma, and Petaluma creeks), 2016

Outdoor education modules for Napa Resource Conservation District student field trips, 2014, 2015

Organized tour of Napa River restoration projects for UC Davis affiliates, 2015

South San Francisco Bay Salt Ponds Fish Study, 2014

Pine Creek Annual Fish Survey (Modoc County), 2010

Putah Creek Annual Field Survey, 2009

Awards

2015 Kinsella Memorial Prize in recognition of the Outstanding Graduate Research Dissertation in the College of Agricultural and Environmental Sciences at UC Davis

First place, 2013 GIS Day map competition at UC Davis

References

Peter Moyle, Distinguished Professor Emeritus
Department of Wildlife, Fish, and Conservation Biology, University of California, One Shields Ave.,
Davis, CA

Deborah Elliott-Fisk, Professor Emeritus
Department of Wildlife, Fish, and Conservation Biology, University of California, One Shields Ave.,
Davis, CA

Jay Lund, Professor
Department of Civil and Environmental Engineering, University of California, One Shields Ave., Davis,
CA