

September 16, 2025

Matt Ringel, Planner III
Napa County Planning, Building & Environmental Services
1195 Third Street, Suite 210
Napa, CA 94559
matthew.ringel@countyofnapa.org

**Re: Arrow & Branch Winery Major Modification – Use Permit #P23-00057-MOD
Request for Denial of Application or, at Minimum, Preparation of a Full Environmental
Impact Report**

Dear Mr. Ringel:

We are residents of the Darms Lane/Wurz Lane neighborhood and submit these comments opposing the proposed Arrow & Branch Winery (A&B Winery) Major Modification and the accompanying Initial Study–Mitigated Negative Declaration (IS-MND). We are not attorneys and have done our best to interpret the relevant rules and regulations; please allow us some latitude if there are minor errors in citation. As proposed, there are significant negative impacts to the surrounding neighbors, material land-use concerns under Napa County’s Agricultural Preserve policies, and the IS-MND does not appear to satisfy the California Environmental Quality Act (CEQA). We respectfully request the County deny the application. At minimum, a full Environmental Impact Report (EIR) is required.

Currently, the lights are on from 8 PM to 6 AM. The high-intensity lights are quite disruptive. I kindly ask if it would be possible to adjust the schedule to have the lights turned off by 10 PM. This change would greatly improve the quality of life for those of us living nearby.

1) Neighborhood Impacts (Noise, Traffic, Quality of Life)

We fully acknowledge that living in the Agricultural Preserve includes normal farming and vineyard activities—cultivation, pruning, replanting, harvest activities, frost-protection fans, etc. Those are part of the rural character we value.

However, the modification would substantially intensify visitor traffic, event activity, and production operations well beyond what has surrounded the neighborhood for many years. The cumulative effect of the proposed major modification—along with other development activity in proximity to the A&B Winery—is increased noise, traffic, lighting, and loss of privacy for residences that predate the winery, with likely adverse effects on property values and neighborhood character.

On September 12, 2025, Napa County issued a “Reported or Apparent Code Violation” regarding an A&B Winery marketing event that, as planned, exceeded the limitations of its current use permit. In addition, the use of amplified music outside of the facility violated its permit. Demonstrated disregard for the conditions of approval is a compelling reason not to increase the size and frequency of such events.

2) Other Significant Issues Requiring an EIR

A. Biological Resources – Salmonids in Dry Creek

Dry Creek forms the site’s northern boundary and is a County-designated Significant Stream. The IS-MND and its supporting biological reports omit analysis of Chinook salmon and other anadromous fish, despite Dry Creek’s connection to the Napa River system and observations of spawning use. We have video recordings of Chinook salmon spawning in the creek last November in front of the proposed expansion and we are attaching the video to this email. Our neighbor, Armond Patrino, also saw spawning salmon behind his house last November, as he has many times over 30+ years of living on Dry Creek. Consistent with CEQA Guidelines §§15064 and 15126.2, the analysis must address all potentially significant biological effects, including effects on anadromous salmonids in Dry Creek (e.g., Chinook salmon) and other sensitive species meeting §15380 criteria, and must consider feasible, enforceable mitigation (§15126.4).

B. Hydrology / Wastewater – Foreseeable Accident Risk

The project adds an 81,000-gallon process-water tank and targets production increases even though the wastewater analysis shows peak process flows that meet or exceed the permitted dispersal capacity. Storing and handling large volumes of winery wastewater immediately adjacent to a Significant Stream presents a reasonably foreseeable accident (overflow, leak, storm-event bypass) that could degrade salmonid habitat—an impact the IS-MND does not adequately analyze (Guidelines §15064).

C. Cumulative Impacts – Oak Knoll Hotel & Silenus / Ideology Cellars Winery

CEQA requires evaluation of cumulative noise and traffic from past, present, and reasonably foreseeable projects. The Oak Knoll Hotel, currently under construction, lies approximately 0.57 miles from Arrow & Branch and its certified EIR identifies substantial noise/traffic considerations. The adjacent Silenus / Ideology Cellars Winery contributes traffic and noise from production and marketing activities. The IS-MND does not analyze the combined effects of these concurrent visitor-serving uses—especially during harvest season, when all operate at peak intensity. These

cumulative effects must be analyzed and appropriate mitigation measures must be addressed if required.

D. Water Availability & Groundwater (Exhibits E and F)

The project is on the Napa Valley Floor, where the County applies a reduced Water Use Screening Criterion of 0.3 acre-feet per acre per year; because existing use already exceeds 0.3, the applicable test is no net increase from the baseline. Exhibit E calculates a combined existing groundwater use of approximately 9.33 acre-feet per year (Arrow & Branch plus the Silenus/Ideology easement well) and proposes to maintain no net increase at that level using process-wastewater recycling. While this approach meets the screening policy on paper, the claimed offset lacks detailed engineering design, enforceable monitoring, and dry-year reliability analysis, leaving uncertainty as to whether the offset will consistently materialize when needed.

Exhibit F (Tier III) evaluates groundwater-surface water interaction and concludes the Project and Easement Wells are not hydraulically connected to Dry Creek and therefore will not directly affect creek flows. Even accepting that conclusion, an EIR is still warranted to establish performance-based monitoring and triggers (e.g., groundwater levels, offset volumes, and seasonal creek conditions) and to analyze cumulative demand with the adjacent easement well under dry-year conditions, so that any unforeseen effects on the seasonally connected shallow alluvium and Dry Creek are detected and corrected in real time.

E. Tier 2 Well-Interference Trigger (500-Foot Proximity)

Exhibit F's Cross-Section A-A' (Figure 5) plots the Project Well (WCR 2020-002111) and several nearby off-site wells by well-log ID. Although owner names are not shown, the adjacent parcel APN 034-212-010 (Patrino) appears to contain a domestic well within approximately 500 feet of the Project Well. Under Napa County's Water Availability Analysis, a Tier 2 well-interference analysis is required when a neighboring off-site well is located within 500 feet of the project well, irrespective of whether the project proposes no net increase in pumping. Residential wells on properties adjacent to ours have experienced periods when their production was insufficient to meet the owners' needs. Even limited additional drawdown by this Project Well could adversely impact the neighbors. The IS-MND's conclusion that Tier 2 is not required addresses only the "no net increase" screen and does not address the 500-foot proximity trigger. At a minimum, the County should confirm the distances between the wells shown in Figure 5 and the Project Well (WCR 2020-002111) and, if required, prepare a Tier 2 well-interference analysis. If the permit proceeds, a Well-Interference Monitoring & Response Plan should be imposed, including baseline measurements for participating domestic wells, ongoing monitoring/reporting, and enforceable drawdown-triggered curtailment/mitigation.

3) Agricultural Preserve Intent and Scale of Facility

Napa's Agricultural Preserve policies are intended to preserve the County's agricultural heritage and keep agriculture the predominant land use, precluding uses incompatible with that purpose.

Siting a 45,000-gallon/year production facility—with daily visitation up to 34 and events up to 125 guests—on a 10-acre parcel that contains only ~6 acres of vineyard means the majority of fruit must be trucked in, concentrating visitor-serving and processing activity next to long-standing residences. While wineries are a permitted agricultural processing use, a facility of this scale and intensity on a small parcel, **positioned with minimum setbacks**, alongside a Significant Stream appears counter to the intent of preserving the area's agricultural character and rural quiet. At a minimum, if the County proceeds, it should do so only after full EIR review and with enforceable limits that truly protect the neighborhood and resource setting.

4) Inadequate Mitigation

Reliance on generic riparian fencing, monitoring, and average-based noise assumptions does not address (a) fish-specific protections, (b) foreseeable wastewater accidents, or (c) cumulative noise/traffic. CEQA §21002 requires adoption of all feasible mitigation; the measures proposed do not reduce impacts to less-than-significant levels.

Request

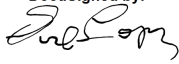
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Approving this project on the current IS-MND would be inconsistent with CEQA and would undermine Napa County's Agricultural Preserve policies.

Thank you for your consideration.

Respectfully submitted,

DocuSigned by:

B30A447A29174D0...

Soila Lopez

1026 Darms Lane

Napa, CA 94558

Brad Rey

2106 Wurz Lane

Napa CA 94558

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The lighting at the Winery, which shines directly into my home during the night. Currently, the lights are on from 8 PM to 6 AM. The high-intensity lights are quite disruptive. I kindly ask if it would be possible to adjust the schedule to have the lights turned off by 10 PM. This change would greatly improve the quality of life for those of us living nearby.

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04EE5388AAC24F2...
2106 Wurz lane
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Teresa Cazarez
1026 Darms Lane
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Teresa Cazarez

1026 Darms Lane

Napa, CA 94558

DocuSigned by:

EC579853337B4C5...

From: [Janet Trefethen](#)
To: [Ringel, Matthew](#)
Cc: [Steve Contursi](#)
Subject: arrow&branch use permit
Date: Tuesday, September 16, 2025 10:06:40 PM

[External Email - Use Caution]

Dear Members of the Planning commission, I am writing in support of the Arrow and Branch winery permit that I understand you are considering on the 17th.

We are located just east of Arrow and Branch, on the other side of Hwy 29 in the Oak Knoll District. We started in 1968 and love farming and the beauty and uniqueness of our valley. We are grateful for the Ag preserve.

We are familiar with Arrow and Branch and feel that the small family winery fits the Napa Valley and believe the owners are and will continue to be good stewards of the land as well as good neighbors. We hope you will approve their permit.

Sincerely,
Janet Trefethen

Janet Trefethen, Wine Grower & Cowgirl
Trefethen Family Vineyards
707-255-7700 |

[https://urldefense.com/v3/_http://trefethen.com_!!GJIbE8EFNbU!0oM3JsJyCocoYbbuEj7Y7m6lkZMi6TxpA6GLIBFdrUSy-yZ4LOonPNwUE1zUSCxCk0OESHGh8V-NspntyZJw3jOn4cLcm6CC\\$](https://urldefense.com/v3/_http://trefethen.com_!!GJIbE8EFNbU!0oM3JsJyCocoYbbuEj7Y7m6lkZMi6TxpA6GLIBFdrUSy-yZ4LOonPNwUE1zUSCxCk0OESHGh8V-NspntyZJw3jOn4cLcm6CC$)

One Family, One Estate, One Passion