



# WATER AUDIT CALIFORNIA

A PUBLIC BENEFIT CORPORATION

952 SCHOOL STREET #316 NAPA CA 94559

VOICE: (707) 681-5111

EMAIL: GENERAL@WATERAUDITCA.ORG

April 15, 2025

To Napa County Planning Commission

Sent via email to: meetingclerk@countyofnapa.org

RE April 16, 2025  
Agenda Item 7B. WRIGHTS CORNER INC. / WRIGHT'S CORNER / USE  
PERMIT MAJOR MODIFICATION NO. P22-00241-MOD ("Application")

To whom it may concern:

Water Audit California ("Water Audit") is a public benefit corporation with a mission to protect the public trust. The following comments are submitted on its own behalf, and in the public interest.

The Applicant proposes to expand the approved employees from three (3) to eight (8), and visitation from approved seventeen (17) per day to a proposed ninety (90) per day. Additionally, event programs are proposed to increase the presently approved three (3) annual events with fifty (50) people by an additional four (4) monthly events with up to 85 people.

Comments submitted by California Department of Fish and Wildlife ("CDFW") reject a Negative Declaration and require mitigation conditions. Water Audit California concurs with CDFW and further comments:

**1. Mitigation must include consideration of the toxic character of the site.**

**Not in the Agenda packet** but found on County Electronic Document Retrieval database is a 2017 Well Notice UST # NAPA 0602 HAZFAX #283:

**"THIS PARCEL IS ON THE NAPA COUNTY LIST OF CONTAMINATED SITES.  
PRIOR TO ISSUANCE OF ANY WELLS ON THIS OR ADJOINING PARCELS  
(OR WITHIN THE GENERAL AREA) - CONTACT THE HAZARDOUS**



**MATERIALS DIVISION OF THIS DEPARTMENT AND CHECK THE CONTAMINATED SITE MAPS."** (see attached)

**2. Mitigation must include the requirement for a public water system.**

Previous conditions of approval by prior planning review did not require a regulated small public water system. (Agenda Packet page 80/1 Attachment C. Previous Project Conditions). Present Conditions of Approval must include installation of a small public water system and installation of new well.

Environmental Health Services recommended draft conditions of approval for this project and required that the water supply and related components comply with the California Safe Drinking Water Act and Related Laws. (Agenda Packet page 60 Attachment B. Conditions of Approval Memorandum Environmental Health Services dated 4/15/2024; See also the County website "Water System Information for Use Permits" dated January 5, 2005, revised December 6, 2016, hosted at <https://www.countyofnapa.org/DocumentCenter/View/10959/Water-System-Information-for-Use-Permits-2025?bidId=>).

At page 1:

**"If your project will be regulated as a small public water system, a water system feasibility report will be required as a completeness item at the time a Use Permit application is submitted.** This report ensures that the proposed project can satisfy the technical, managerial and financial requirements set forth by the Water Board and must include the information listed on the attached worksheet. There is a possibility that existing wells may not meet the construction requirements for a regulated water system. If the source does not meet the requirements, a new water supply will have to be developed, which must be reflected in the feasibility report." (emphasis added)

At page 2:

**"Water supply capacity. Can the water system (including all sources and storage facilities) supply a minimum of three gallons per minute for at least 24 hours for each service connection served?"** (emphasis added)

The Applicant Checklist included: "Additional Information Required by the Environmental Health Department." In conformity with state law, the information listed includes the Water Supply Feasibility Study and Completed Business Activities form. These two documents are **NOT** included in the application.

Distinguished from the similarly named Water Availability Analysis, which deals with the quantum of water necessary, the Water System Feasibility Report is a detailed



enumeration of the technical requirements, including water quality testing and reporting necessary when "the water supply system will serve 25 or more people inclusive of employees, visitors, and residents or if kitchen is proposed. See enclosed handout provided by Environmental Services." There is no "enclosed handout" in the agenda

The Current Project folder does not include a Water Supply Feasibility Study.

The CEQA posting has no Water Supply Feasibility Study (see <https://ceqanet.opr.ca.gov/2025030679>; see also Agenda Attachments compared with CEQA Attachments in attached exhibit.)

**3. California requires all public water systems to have at least two sources of water.**

The requirement for public water systems to have at least two sources of water – this ensures redundancy and helps to protect against water quality issues or disruptions. The specific requirements for these sources, including their capacity, quality, and reliability, are outlined in California's regulations, such as Title 22 of the California Code of Regulations. Thus, the second well must be considered in a revised Tier 3 Analysis.

The Public Works Department and Planning Engineering Division have different missions and duties which are being conflated with each other.

The COA Memorandum from the Planning Engineering Division dated March 21, 2025, states that it has reviewed the WAA and determined it complete and reasonable for "Vine Cliff Winery" This certification is perplexing as that is not the name of the applicant for this project, and the project proposed is not a winery.

Even if one is willing to overlook that the approval of the WAA the Planning Engineering Division is for the wrong project, that entity is **not** the Public Works Department. The Public Works Director has not determined the technical adequacy of the Water Availability Analysis and there is NO WATER FEASIBILITY STUDY.

The Conditions of Approval operational characteristics of the project related to groundwater management omits language "jointly implemented by Public Works"



#### **4. Miscellaneous.**

- **The total groundwater consumption is not stated in the Conditions of Approval.**

"The parcel shall be limited to 2.70 acre-feet of groundwater per year for all water consuming activities on the parcel", and "Water Management Demand Program." (see Agenda Packet page 37 Conditions of Approval 4.1 GROUNDWATER MANAGEMENT-WELLS)

- **The Application Checklist has No Adjoining Property Owner List (see Agenda Packet page 122 Attachment E. Application; see also Agenda Packet page 139 Attachment E. Application)**
- **The Applicant Checklist struck out several "Technical Information and Reports" without explanation, including the Traffic Study, Archeological/Cultural Resources Study, and Water Availability Study. Nevertheless, and inconsistently, these three studies are included in the application (see Agenda Packet page 126 Attachment E. Application.)**

The Traffic impact Study is using a Winery Worksheet. The trip calculations are based on "Winery" visitation and marketing events factors. The project is not a Winery. (see Agenda Packet page 227/8 Attachment G. Transportation Impact Study)

- **The CEQA Summary Form for Document Submittal and Notice of Completion Reviewing Agency listed only CDFW. Neither document included the Reviewing Agencies SWRCB, Water Quality, CalTrans or neighboring cities.**



Last, please see the following links and the attached exhibits to ensure a complete record.

1. Public Works About Us "Natural Resources Groundwater" <https://www.countyofnapa.org/1646/About-Us>
2. Public Works Organizational Chart 2025-01-27\_NC\_Public\_Works\_Org\_Chart\_202501280833058339 page 3 "Water Resources & R.I.Ds" <https://www.countyofnapa.org/DocumentCenter/View/3244/Public-Works-Department-Organizational-Chart-PDF>
3. COUNTY Public Works Watershed Management webpage "Managing and monitoring groundwater" <https://www.countyofnapa.org/1161/Watershed-Management>

Respectfully,



William McKinnon  
General Counsel  
Water Audit California



**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

**Project Title:** Wrights Corner Use Permit Major ModificationLead Agency: Napa CountyContact Person: Kelli CahillMailing Address: 1195 Third Street, Suite 210Phone: 707-259-8226City: NapaZip: 94559County: Napa**Project Location:** County: Napa City/Nearest Community: Unincorporated/Nearest City - City of NapaCross Streets: Closest intersection Old Sonoma Road and Old Sonoma Highway Zip Code: 94558Longitude/Latitude (degrees, minutes and seconds): 38 ° 15 ' 24.309 " N / -122 ° 20 ' 19.887 " W Total Acres: 2.35Assessor's Parcel No.: 047-110-017-000 Section: 05N Twp.: 04W Range: 30 Base: MDMWithin 2 Miles: State Hwy #: Hwy 12 / Cameros Hwy Waterways: Cameros CreekAirports: n/a Railways: n/a Schools: n/a**Document Type:**

CEQA: ☐ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document  
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document  
☒ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other: ☐  
☐ Mit Neg Dec Other: ☐ FONSI

**Local Action Type:**

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation  
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment  
☐ General Plan Element ☐ Planned Unit Development ☒ Use Permit ☐ Coastal Permit  
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: ☐

**Development Type:**

☐ Residential: Units ☐ Acres ☐ Transportation: Type ☐  
☐ Office: Sq.ft. ☐ Acres ☐ Employees ☐ Mining: Mineral ☐  
☒ Commercial: Sq.ft. 11183 Acres 2.35 Employees 5 ☐ Power: Type ☐ MW  
☐ Industrial: Sq.ft. ☐ Acres ☐ Employees ☐ Waste Treatment: Type ☐ MGD  
☐ Educational: ☐ Hazardous Waste: Type ☐  
☐ Recreational: ☐ Other: ☐  
☐ Water Facilities: Type ☐ MGD ☐

**Project Issues Discussed in Document:**

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation  
☒ Agricultural Land ☒ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality  
☒ Air Quality ☒ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater  
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian  
☒ Biological Resources ☒ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement  
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use  
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects  
☒ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other: ☐

**Present Land Use/Zoning/General Plan Designation:**

Residence, Art Gallery, Bike rental/guided tour and luxury tour car staging business/Commercial Limited (CL) zoning district and Agriculture, Watershed, and Open Space (AWOS)/Agricultural Resources (AR) general plan designation

**Project Description:** (please use a separate page if necessary)

This application requests a change in use to three existing structures on the subject property, including: 1) converting an existing 2,738 sf three (3) bedroom residence into an inn with eight (8) guest rooms and construction of five (5) new stand-alone guest cottages of 645 sf each (totaling 3,175 sf) with proposed private events for guests of the inn, 2) convert an existing bike rental/guided tour and luxury tour car staging business to a beer and wine tavern, 3) convert an existing furniture store with art, antique, and retail products to a mercantile store with wine tastings, 4) addition of a new mobile concession trailer (130 sf) for the sale of coffee and morning snacks, 5) addition of a new 397 sf bathroom with attached storage room for patrons, 6) site improvements to meet Napa County Roads and Street Standards for the commercial driveway, and construction of 28 additional parking for a total of 36 on-site, and 7) upgrade the septic system prior to conversion of the residence to lodging.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010

EXHIBIT 1



## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans District # _____	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Regional WQCB # _____
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # <u>3</u>	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date 3/13/25 Ending Date 4/15/25

### Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative: Kelly C. Liel Date: 3/12/25

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



**Summary Form for Electronic Document Submittal****Form F**

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: \_\_\_\_\_

Project Title: \_\_\_\_\_

Lead Agency: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Email: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Project Location: \_\_\_\_\_  

CityCounty

Project Description (Proposed actions, location, and/or consequences).

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

Revised September 2011



If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Provide a list of the responsible or trustee agencies for the project.



# Request for Public Notice Distribution

(Check all required boxes. Any boxes left unchecked will not be completed).

ADMIN USE ONLY:

Date Completed:

3/13/25

By:

ARV

Project Name: Wrights Corner Use Permit Modification

Project No(s): P22-00241-MOD

APN(s): 047-110-017

Project Planner: Kelli Cahill

## 1. Specify Type of Notice(s)

<input type="checkbox"/> Early Project Courtesy Notice	<input type="checkbox"/> CEQA – Notice of Exemption (NOE) Journal request <a href="mailto:adriana.franco@countyofnapa.org">adriana.franco@countyofnapa.org</a> & <a href="mailto:meetingclerk@countyofnapa.org">meetingclerk@countyofnapa.org</a>
<input checked="" type="checkbox"/> Notice of Public Hearing	<input type="checkbox"/> CEQA – Notice of Determination (NOD) Journal request <a href="mailto:adriana.franco@countyofnapa.org">adriana.franco@countyofnapa.org</a> & <a href="mailto:meetingclerk@countyofnapa.org">meetingclerk@countyofnapa.org</a>
<input type="checkbox"/> Notice of ZA Intent to Approve or Deny	<input type="checkbox"/> CEQA – Notice of Intent to Adopt an ND or MND
<input type="checkbox"/> Notice of Administrative Decision	<input type="checkbox"/> CEQA – Notice of Preparation of an EIR
<input type="checkbox"/> Other (specify):	<input type="checkbox"/> CEQA – Notice of Availability of and EIR

## 2. Select Notice Location(s)

<input checked="" type="checkbox"/> Napa Valley Register (Tues, Thurs, Sat) Publication Date: 3.13.25 3.5 25 ✓	<input checked="" type="checkbox"/> Properties within 1000 ft. of Project Site Mailing list provided. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> County Clerk (CEQA Notices, NOE & NOD) Filing/Posting Date:	<input checked="" type="checkbox"/> Interested Parties/CEQA Notification List
<input checked="" type="checkbox"/> Applicant Name: Kerry Smith Address(es)/email(s): <a href="mailto:thewrightcorner@earthlink.net">thewrightcorner@earthlink.net</a> <a href="mailto:kerry@kerrysmithwatercolors.com">kerry@kerrysmithwatercolors.com</a>	<input type="checkbox"/> Representative Name: Address(es)/email(s):
<input checked="" type="checkbox"/> Property Owner Name: Address(es)/email(s): Same as applicant	<input type="checkbox"/> Nearest City(s), Town(s), or County(s) Address(es)/email(s):

## 3. Other Special Instructions

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A Tradition of Stewardship  
A Commitment to Service

## PUBLIC NOTICE

### **NOTICE OF PLANNING COMMISSION HEARING & NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION**

On Wednesday morning, the 16<sup>TH</sup> day of April 2025, at 9:00 a.m. at 1195 Third Street, Suite 305, Napa, California, a public hearing will be conducted by the Napa County Planning Commission regarding the project identified below. All interested persons are invited to attend the hearing and be heard.

#### **Wrights Corner – Use Permit Major Modification #P22-00241-MOD**

**Location:** 4370 (also addressed as 4372 and 4374), Old Sonoma Highway Napa - Assessor's Parcel No. 047-110-017; 2.35 acres

**Zoning and General Plan Designation:** Commercial Limited (CL) zoning district and Agriculture, Watershed, and Open Space (AWOS)/Agricultural Resources (AR) general plan designation.

**CEQA Status:** Consideration and possible adoption of a Negative Declaration. According to the proposed Negative Declaration, the proposed project would not have any potentially significant environmental impacts. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

**Request:** This application requests a change in use to three existing structures on the subject property, including; 1) converting an existing 2,738 sf three (3) bedroom residence into an inn with eight (8) guest rooms and construction of five (5) new stand-alone guest cottages of 645 sf each (totaling 3,175 sf) with proposed private events for guests of the inn, 2) convert an existing bike rental/guided tour and luxury tour car staging business to a beer and wine tavern, 3) convert an existing furniture store with art, antique, and retail products to a mercantile store with wine tastings, 4) addition of a new mobile concession trailer (130 sf) for the sale of coffee and morning snacks, 5) addition of a new 397 sf bathroom with attached storage room for patrons, 6) site improvements to meet Napa County Roads and Street Standards for the commercial driveway, and construction of 28 additional parking for a total of 36 on-site, and 7) upgrade the septic system prior to conversion of the residence to lodging. Application materials, including the draft environmental determination are available on the Department's Current Projects Explorer at: <https://www.countyofnapa.org/2876/Current-Projects-Explorer>

Copies of documents and other information relating to the project described above may be examined between 8:00 AM and 4:00 PM Monday through Friday at the office of the Planning, Building, and Environmental Services Department, Napa County Administration Building, 1195 Third St, Ste 210, Napa, California. For documents that are publicly available on the Current Projects Explorer, there will be a Public Record Copying Fee associated with the physical printing of documents. While drops-in may be accommodated to the extent possible on a case-by-case basis, we strongly encourage you to schedule an appointment for document review.

Written and verbal comments regarding this project and comments regarding the environmental effects of this project and the adequacy of the proposed Negative Declaration are solicited. Written comments must be presented during the public review period, which runs from March 13, 2025, through April 14, 2025. Comments or appointment requests to review documents should be directed to Kelli Cahill, Planner III, Napa County Planning, Building & Environmental Services Department, 1195 Third Street, Suite 210, Napa, California; (707) 265-2325 or [kelli.cahill@countyofnapa.org](mailto:kelli.cahill@countyofnapa.org). Comments must be received before Noon on April 14, 2025.



If you challenge the particular proceeding in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the Planning Commission at, or prior to the public hearing.

Published Date: March 13, 2025

Brian D. Bordona

Director of Planning, Building, & Environmental Services



Notice ID: b7wjLdeKMhEWyPrYJqZD ⓘ

Notice ID: b7wjLdeKMhEWyPrYJqZD ⓘ

Confirmation Status  
Confirmed

Status  
Awaiting Invoice Payment

Order Number  
COL-CA-100802

Ⓢ Waiting for publisher...

## No related efforts conducted

 VIEW PROOF [VIEW INVOICE](#)

⑤ PAY INVOICE

ⓧ CANCEL NOTICE

[illegible]

597 Words - 45 Lines - 11.30 Total Column Inches

## PDF

RTF





A Tradition of Stewardship  
A Commitment to Service

**Planning, Building & Environmental Services**

1195 Third Street, Suite 210  
Napa, CA 94559  
[www.countyofnapa.org](http://www.countyofnapa.org)

**Brian Bordona**  
Director

## MEMORANDUM

To:	All interested parties	From:	Division of Environmental Health
Date:	January 5, 2005 Revised December 6, 2018	Re:	Use Permits and Regulated Water Systems

The purpose of this memo is to provide information regarding requirements for regulated water system permitting. The Division of Environmental Health has a contract with the California State Water Resources Control Board (Water Board) to administer the small water system program. Public water systems are required to be permitted by Water Board or the local delegated agency.

In Napa County, the most commonly proposed small public water systems serve wineries. During the use permit process, the division reviews the number of anticipated visitors, employees and onsite residents and makes a determination if the proposed facility is required to be served by a regulated water system. A public water system is required if the project includes either (1) a combined number of users (visitors, employees, residents) greater than 24 daily for at least 60 days of the year, or (2) the total number of employees and residents is greater than 24 daily for 6 months or more of the year. If either threshold is met, the water system will be regulated. If you have questions on whether the proposed project will be regulated as a public water system, contact this division to discuss with the district inspector. If the project does not meet these thresholds but will have a regulated kitchen used for food service for food and wine pairings or marketing events, a different type of regulated water system is required.

If your project will be regulated as a small public water system, a water system feasibility report will be required as a completeness item at the time a Use Permit application is submitted. This report ensures that the proposed project can satisfy the technical, managerial and financial requirements set forth by the Water Board and must include the information listed on the attached worksheet. There is a possibility that existing wells may not meet the construction requirements for a regulated water system. If the source does not meet the requirements, a new water supply will have to be developed, which must be reflected in the feasibility report. Prior to issuance of a building permit, the new water supply must be developed and full plans for the water system must be submitted and approved by this division. In addition to the local requirements, the Water Board requires a water system to also submit a preliminary technical report demonstrating the water system is viable and ensuring the water system has evaluated whether consolidating with another water system is possible. The County must receive concurrence from the Water Board before any related building permits can be issued. Additional information regarding the preliminary technical report required by the Water Board can be found at: [https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/Permits.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Permits.html)



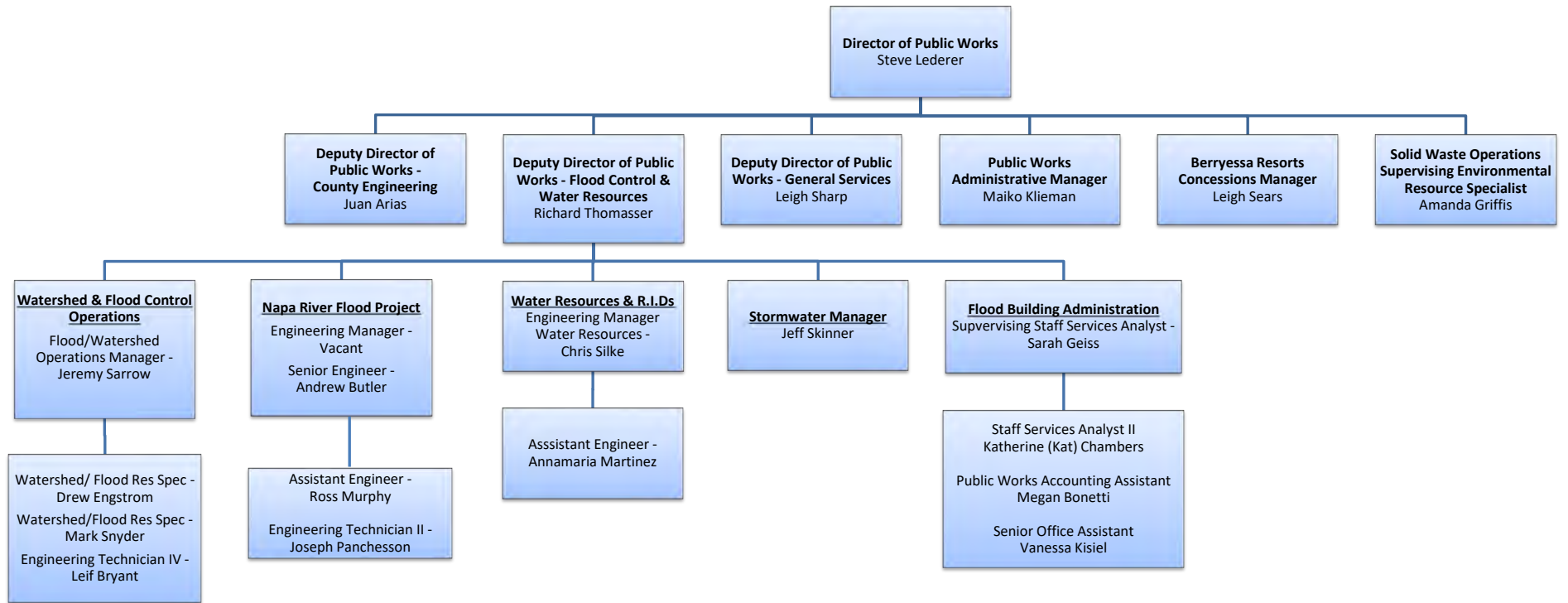
# **New Community and Non-Community Water Systems Technical, Managerial and Financial Capacity Worksheet**

(Use Permit Applications and Water System Feasibility Reports)

1. **Water system name**
2. **Name of person who prepared the report**
3. **Technical Capacity:**
  - 1 System description-from source to point of use-what is expected (including treatment, etc).
  - 1 One year projection for water demand and an analysis of the water system to meet the projected demand (project expansion and improvements for a ten year period).
  - 1 Source adequacy:
    - Groundwater: Does the well have a 50-foot seal with a 3-inch annular space? Is a well log available?
    - Surface water treatment: Can the water system comply with the Surface Water Treatment Rule?
  - 1 Water supply capacity. Can the water system (including all sources and storage facilities) supply a minimum of three gallons per minute for at least 24 hours for each service connection served?
  - 1 Provide a characterization of the water quality (or expected water quality if a new source is required), including a comparison with established or proposed drinking water standards and the feasibility of meeting these standards.
  - 1 An evaluation of the feasibility of consolidation with other (existing) water systems.
4. **Managerial:**
  - 1 Description of the organization's ability to manage a water system (personnel to be hired and/or job descriptions for water system maintenance responsibilities). For systems that use land that is not owned by the water system, the terms for a long-term agreement for use of the land/facilities must be disclosed.
  - 1 Document the system's water rights.
5. **Financial:**
  - 1 Budget projection and description of system's financial capacity (your ability to financially support the operation of a water system).

**Questions on this worksheet or the information required should be addressed to the water specialist in the Division of Environmental Health.**







# Environmental

## Cover Sheet

APN	047-110 -017 -000
Permit #	
Program	WELL
DocType	NOTICE
Street #	4370
Street Name	OLD SONOMA RD.
Year	





47-110-17

Well

Montgomery designs

UST# NAPA 0602 HAZFAC # 283

**NOTE**

THIS PARCEL IS ON THE NAPA COUNTY LIST OF CONTAMINATED SITES. PRIOR TO ISSUANCE OF ANY WELLS ON THIS OR ADJOINING PARCELS (OR WITHIN THE GENERAL AREA) - CONTACT THE HAZARDOUS MATERIALS DIVISION OF THIS DEPARTMENT AND CHECK THE CONTAMINATED SITE MAPS.

USE THE NUMBER ON THE FRONT OF THIS AP FILE FOR REFERENCING THE PARTICULAR CONTAMINATED SITE.

THANK YOU.



Watershed Management | Napa

countyofnapa.org/1161/Watershed-Management

Create a Website Account - Manage notification subscriptions, save form progress and more.

Website Sign In

Stream Maintenance & Watershed Management Program

Napa County Watersheds

Watershed Resources & Guidance Materials

Home › Departments › Public Works › Flood District › Watershed Management

## Watershed Management

In Napa County, Watershed Management consists of:

- Clearing and maintaining the 13 miles of channels within the Flood Control District's jurisdiction as part of the [Stream Maintenance Program](#)
- Clearing problem areas within the Napa River and its tributaries
- Dredging the Napa River
- Repairing and stabilizing the River and stream banks
- Installing and operating a Countywide early warning system for flooding
- Replacing and installing major storm drain trunk lines
- Participating in federal and State flood protection grant programs
- **Managing and monitoring groundwater**
- Overseeing adjudicated watersheds
- Maintaining the [benefit assessment program](#)
- Preparing special studies for flood protection and watershed management
- Developing standardized and integrated floodplain management regulations
- Assisting the local community in complying with [National Pollutant Discharge Elimination System \(NPDES\) requirements](#)
- A detailed description of the above projects and services and the current fiscal year's [project report FY 20-21 \(PDF\)](#)

### Contact Us

#### Watershed Management

**Physical Address**  
804 1st Street  
Napa, CA 94559

Phone: [707-259-8600](tel:707-259-8600)

### Related Documents

- [Watershed Management Project 96-1 Engineer's Report FY 20-21 \(PDF\)](#)

Leave a message

EXHIBIT 7







## EXHIBIT 9



B. WRIGHTS CORNER INC. / WRIGHT'S CORNER / USE PERMIT  
MAJOR MODIFICATION NO. P22-00241-MOD

25-584

CEQA STATUS: Consideration and possible adoption of a Negative Declaration. According to the proposed Negative Declaration, the proposed project would not have any potentially significant environmental impacts. In accordance with Section 15105(b) of the California Environmental Quality Act (CEQA) Guidelines, Napa County submitted the proposed Initial Study/Negative Declaration to the State Clearinghouse for a 30-day review period beginning March 13, 2025, and running through April 15, 2025 (State Clearinghouse No. SCH 2025030679 - officially accepted by the SCH on March 17th) <https://ceqa.net.opr.ca.gov/2025030679>. This project is not on any lists of hazardous waste sites enumerated under Government Code Section 65962.5.

REQUEST: This application requests a change in use to three existing structures on the subject property, including: 1) converting an existing 2,738 sf three (3) bedroom residence into an inn with eight (8) guest rooms and construction of five (5) new stand-alone guest cottages of 645 sf each (totaling 3,175 sf) with proposed private events for guests of the inn, 2) convert an existing bike rental/guided tour and luxury tour car staging business to a beer and wine Tavern, 3) convert an existing furniture store with art, antique, and retail products to a mercantile store with wine tastings, 4) addition of a new mobile concession trailer (130 sf) for the sale of coffee and morning snacks, 5) addition of a new 397 sf bathroom with attached storage room for patrons, 6) site improvements to meet Napa County Roads and Street Standards for the commercial driveway, and construction of 28 additional parking for a total of 36 on-site, and 7) upgrade the septic system prior to conversion of the residence to lodging. The project is located on a 2.35-acre parcel within the Commercial Limited (CL) zoning district and designated as Agriculture, Watershed and Open Space (AWOS) and Agricultural Resources (AR) at 4370 (also addressed as 4372 and 4374) Old Sonoma Highway, Napa (APN 047-110-017).

STAFF RECOMMENDATION: Adopt the Negative Declaration and approve the Use Permit Modification subject to the recommended conditions of approval.

STAFF CONTACT: Kelli Cahill, Planner III; (707) 265-2325 or [kelli.cahill@countyofnapa.org](mailto:kelli.cahill@countyofnapa.org)

APPLICANT CONTACT: Kerry Smith, Owner; (707) 812-5006 or

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Planning Commission Agenda April 16, 2025

[thewrightcorner@earthlink.net](mailto:thewrightcorner@earthlink.net)

**Attachments:** [Attachment A - Recommended Findings.pdf](#)  
[Attachment B - Recommended Conditions of Approval.pdf](#)  
[Attachment C - Previous Project Conditions.pdf](#)  
[Attachment D - Initial Study Negative Declaration.pdf](#)  
[Attachment E - Application and Project Description.pdf](#)  
[Attachment F - Project Plan Set.pdf](#)  
[Attachment G - Transportation Impact Study.pdf](#)  
[Attachment H - Wastewater Feasibility Study.pdf](#)  
[Attachment I - Water Availability Analysis.pdf](#)  
[Attachment J - Stormwater Control.pdf](#)  
[Attachment K - Archaeological Resource Management Report \(Confidential\).pdf](#)  
[Attachment L - Graphics.pdf](#)  
[Attachment M - Project Summary Worksheet.pdf](#)

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Wrights Corner Use Permit A

ceqa.net.opr.ca.gov/2025030679

CEQA

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Phone (707) 265-2325

Email [kelli.cahill@countyofnapa.org](mailto:kelli.cahill@countyofnapa.org)

Location

Coordinates 38°15'14.88"N 122°20'15.88"W

Cities unincorporated

Counties Napa

Regions unincorporated

Cross Streets Old Sonoma Road and Old Sonoma Highway

Zip 94558

Total Acres 2.35

Jobs 5

Parcel # 047-110-017-000

State Highways Hwy 12 / Clearview Hwy

Railways n/a

Airports n/a

Schools 0

Waterways California Creek

Township 08N

Range 08W

Section 30

Base MDM

Notice of Completion

State Review Period Start 3/17/2025

State Review Period End 4/15/2025

State Reviewing Agencies California Air Resources Board (ARB), California Department of Fish and Wildlife, Bay Delta Region 3 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Parks and Recreation, California Department of Toxic Substances Control (DTSC), California Department of Transportation, District 4 (DOT), California Department of Water Resources (DWR), California Highway Patrol (CHP), California Native American Heritage Commission (NABC), California Natural Resources Agency, California Regional Water Quality Control Board, San Francisco Bay Region 2 (RWQCB), Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Water Rights

Development Types Commercial (Mercantile, Tavern, Guest Inn, Coffee Cart)(Sq. Ft. 11183, Acres 2.35, Employees 5)

Local Actions Use Permit

Project Issues Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Alleviation, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources/Noise, Population/Housing, Public Services, Recreation, Septic System, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, Wildfire

Public Review Period Start 3/17/2025

Public Review Period End 4/15/2025

Attachments

Draft Environmental Document [Draft IS, NOI, NOI, Public notices, QPR Summary Form, Appx.]

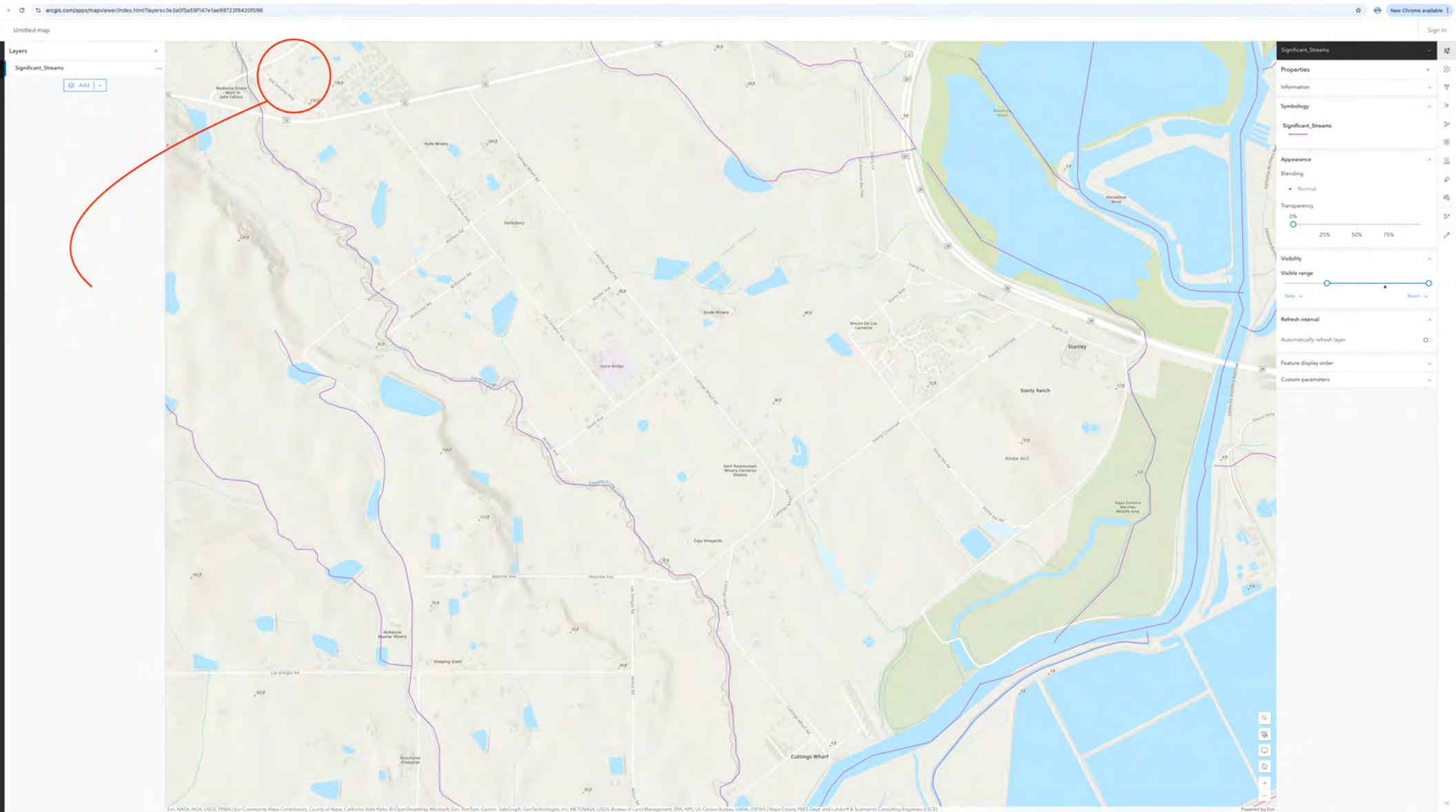
Attachment E - Application and Project Description PDF 2025 Attachment F - Project Plan Set PDF 2025 Attachment G - Transportation Impact Study PDF 2025 Attachment H - Wastewater Feasibility Study PDF 2025 Attachment I - Water Availability Analysis PDF 2025 Attachment J - Stormwater Control PDF 2025 Attachment K - Archaeological Resource Management Report (Confidential).pdf PDF 2025 Attachment L - Graphics.pdf PDF 2025 Attachment M - Project Summary Worksheet.pdf PDF 2025

Notice of Completion (NOC) Transmittal form

Notice of Completion (NOC) Transmittal form PDF 2025

EXHIBIT 10









State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Bay Delta Region  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
(707) 428-2002  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



April 11, 2025

Kelli Cahill, Planner III  
Napa County  
1195 Third Street  
Napa, CA 94559  
[Kelli.Cahill@countyofnapa.org](mailto:Kelli.Cahill@countyofnapa.org)

Subject: Wrights Corner Use Permit Modification P22-00241, SCH No. 2025030679,  
Initial Study/Negative Declaration, Napa County

Dear Ms. Cahill:

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration (IS/MND) from Napa County (County) for the Wrights Corner Use Permit Modification P22-00241 (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

CDFW is submitting comments on the IS/MND to inform the County, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

## **CDFW ROLE**

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** The Wright Corner, Inc. (Owner)

**Objective:** The Project involves the change in use to three existing structures on the subject property, including; 1) converting an existing 2,738 square foot (sf) three bedroom residence into an inn with eight guest rooms and construction of five new stand-alone guest cottages of 645 sf each with private events for guests of the inn; 2) converting an existing bike rental/guided tour and luxury tour car staging business to a beer and wine tavern; 3) converting an existing furniture store with art, antique, and retail products to a mercantile store with wine tastings; 4) adding a mobile concession



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trailer for the sale of coffee and morning snacks; 5) adding a bathroom with attached storage room for patrons; 6) site improvements to meet Napa County Roads and Street Standards for the commercial driveway, and construction of 28 additional parking for a total of 36 on-site; and 7) upgrading the septic system prior to conversion of the residence to lodging.

**Location:** The Project is located on Assessor's Parcel Number 047-110-017-000, at approximately 38.25676°N, -122.33886°W, 4370 (also addressed as 4372 and 4374) Old Sonoma Highway; Napa, CA 94559, Napa County.

## REGULATORY REQUIREMENTS

### California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. **The Project has the potential to impact Swainson's hawk (*Buteo swainsoni*), a State listed as threatened species, as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the project proponent's obligation to comply with CESA.

### Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.



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## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below and in **Attachment 1** Draft Mitigation Monitoring and Reporting Program, CDFW concludes that a **Mitigated Negative Declaration** is appropriate for the Project.

### I. Environmental Setting and Related Impact Shortcoming

***MANDATORY FINDING OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?***

***And,***

***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service?***

#### COMMENT 1: Swainson's Hawk

**Issue:** The IS/NEG does not acknowledge potential impacts to nesting Swainson hawk (*Buteo swainsoni*) near the Project site resulting from Project activities. According to the California Natural Diversity Database (CNDDDB) a nesting Swainson's hawk was observed in 2013 approximately 0.25-mile south of the Project site.

**Specific impacts and why they may occur and be significant:** The 2013 CNDDDB record indicates that Swainson's hawk used habitat near the Project area for nesting, and the species is known to have high nest site fidelity, meaning they return to the same site year after year (Estep 1989, Woodbridge et al. 1995). The documented nest location is within the Caneros Creek riparian corridor, which also runs adjacent to the Project site, and Swainson's hawk are known to nest in riparian habitat, therefore they could nest very close to the Project site. If impacts to Swainson's hawk are not assessed, and appropriate avoidance measures are not provided, the Project could have the potential to impact nesting Swainson's hawk through auditory or visual disturbances above ambient levels within 0.5 miles of the Project site. Disturbances from Project activities may result in Swainson's hawk nest abandonment and loss of eggs or reduced health and vigor and loss of young. Therefore, if an active Swainson's hawk nest is disturbed by the Project, the Project may result in a substantial reduction in



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the number of a threatened species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

**Recommended Mitigation Measure:** To reduce potential impacts to Swainson's hawk to less-than-significant and comply with CESA, CDFW recommends including the mitigation measure below.

Mitigation Measure BIO-1: Swainson's Hawk Surveys and Avoidance Buffer: If Project activities are scheduled during the nesting season for Swainson's hawk (March 1 to September 15), prior to beginning work on the Project, a qualified biologist shall conduct surveys according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&inline>) and prepare a report documenting the survey results. The Project shall obtain CDFW's written approval of the qualified biologist and survey report prior to starting construction activities between March 1 and September 15. Survey methods shall be closely followed by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the Project site or a larger area if needed to identify potentially impacted active nests, unless otherwise approved by CDFW in writing, and 2) for at least the two survey periods immediately prior to initiating Project-related construction activities. Surveys shall occur annually for the duration of the Project. The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. If active Swainson's hawk nests are detected, the Project shall immediately notify CDFW and implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist, unless otherwise approved by CDFW in writing. Any detected nesting Swainson's hawk shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. If take of Swainson's hawk cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities may commence.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form



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can be filled out and submitted online at the following link:  
<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:  
<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the IS/NEG to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nicholas Magnuson, Environmental Scientist, at (707) 815-4166 or [Nicholas.Magnuson@wildlife.ca.gov](mailto:Nicholas.Magnuson@wildlife.ca.gov); or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
Erin Chappell  
Regional Manager  
Bay Delta Region

## Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Planning and Research, State Clearinghouse No. 2025030679

## REFERENCES

Estep, J.A. 1989. Biology, movements, and habitat relationships of the Swainson's Hawk in the Central Valley of California, 1986–87. California Department of Fish and Game, Nongame Bird and Mammal Section Report



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Woodbridge, B. 1998. Swainson's Hawk (*Buteo swainsoni*). In The Riparian Bird Conservation Plan: a strategy for reversing the decline of riparian-associated birds in California. California Partners in Flight.



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## ATTACHMENT 1

### Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM)	Description	Timing	Responsible Party
MM BIO-1	<p><u>Mitigation Measure BIO-1</u>: Swainson's Hawk Surveys and Avoidance Buffer: If Project activities are scheduled during the nesting season for Swainson's hawk (March 1 to September 15), prior to beginning work on the Project, a qualified biologist shall conduct surveys according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&amp;inline</a>) and prepare a report documenting the survey results. The Project shall obtain CDFW's written approval of the qualified biologist and survey report prior to starting construction activities between March 1 and September 15. Survey methods shall be closely followed by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the Project site or a larger area if needed to identify potentially impacted active nests, unless otherwise approved by CDFW in writing, and 2) for at least the two survey periods immediately prior to initiating Project-related construction activities. Surveys shall occur annually for the duration of the Project. The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. If active Swainson's hawk nests are detected, the Project shall immediately notify CDFW and implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist, unless otherwise approved</p>	Prior to Ground Disturbance	Project Applicant



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	by CDFW in writing. Any detected nesting Swainson’s hawk shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. If take of Swainson’s hawk cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP before Project activities may commence.		
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