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Planning, Building & Environmental Services

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Brian D. Bordona
Director

TO: Application File #P21-00047-ECPA
FROM: Pamela Arifian, Planner III
DATE: February 18, 2026
RE: Response to Comments –Matthes Vineyard Conversion
Agricultural Erosion Control Plan (ECPA) File #P21-00047-ECPA
Assessor’s Parcel Number APN 025-070-043
Meadowood Lane (no situs address), St. Helena CA 94574
SCH #2025080483

INTRODUCTION

This memorandum has been prepared by the County Conservation Division to respond to comments received by the Napa County Department of Planning, Building and Environmental Services (Napa County) on the Proposed Initial Study/Mitigated Negative Declaration (Proposed IS/MND) for the Matthes Vineyard Conversion Agricultural Erosion Control Plan #P21-00047-ECPA (proposed project). An IS/MND is an informational document prepared by a Lead Agency, in this case, Napa County, that provides environmental analysis for public review. The agency decision-maker considers it before taking discretionary actions related to any proposed project that may have a significant effect on the environment. The Proposed IS/MND analyzed the impacts resulting from the proposed project and where applicable, identified mitigation measures to minimize the impacts to less-than-significant levels.

This memorandum for the Matthes Vineyard Conversion Agricultural Erosion Control Plan #P21-00047-ECPA Proposed IS/MND presents the name of the persons and/or organizations commenting on the Proposed IS/MND and responses to the received comments. This memorandum, in combination with the IS/MND, completes the Final IS/MND.

CEQA PROCESS

In accordance with Section 15073 of the CEQA *Guidelines*, Napa County submitted the Proposed IS/MND to the State Clearinghouse for a 30-day public review period starting August 14, 2025. In addition, Napa County circulated a Notice of Intent to Adopt the Proposed IS/MND (NOI) to interested agencies and individuals and published the NOI in the Napa Valley Register. The public review period ended on September 15, 2025. During the public review period, Napa County received one (1) comment letter on the Proposed IS/MND. Table 1 below lists the entity that submitted comments on the Proposed IS/MND during the public review and comment period. The comment letter is attached as identified in Table 1.

**TABLE 1
COMMENTS RECEIVED ON THE PROPOSED IS/MND**

Comment No./ Attachment	Comments Received from	Date Received
1	Daniel Skeoch	September 10, 2025

In accordance with CEQA *Guidelines* Section 15074(b), Napa County considers the Proposed IS/MND together with comments received, both during the public review process and before action on the project, prior to adopting the Proposed IS/MND and rendering a decision the project. The *CEQA Guidelines* do not require the preparation of a response to comments for mitigated negative declarations; however, this memorandum responds to comments received. Based on review of the comments received, no new potentially significant impacts beyond those identified in the Proposed IS/MND would occur, no new or additional mitigation measures, or project revisions, must be added to reduce impacts to a less than significant level, and none

of the grounds for recirculation of the Proposed IS/MND as specified in State CEQA *Guidelines* Section 15073.5 have been identified. All potential impacts identified in the Proposed IS/MND were determined to be less-than-significant or less-than-significant with mitigation incorporated.

Furthermore, this Response to Comments Memorandum will be provided to the Owner/Permittee as **notice** of potential Local, State and Federal permits necessary to implement and operate this project as identified within the attached agency comment letters, and that project approval shall be subject to conditions of approval requiring any and all such permits be obtained prior to the commencement of vegetation removal and earth-disturbing activities (grading) associated with #P21-00047-ECPA.

RESPONSE TO COMMENTS

Comment #1 Daniel Skeoch (Attachment 1)

Response to Comment 1.1: As shown in Sheet EC4 of **Exhibit A**, Matthes Erosion Control Plan, the proposed vinerow direction is up and down hill in all blocks (as identified in the Legend and in the site plan); the vineyard development plan does not include terracing. Regarding noise levels exceeding 80 dBA as permitted under Napa County Code (NCC) Section 8.16.080: as detailed in **Section XIII, Noise**, of the Proposed IS/MND, the noise associated with project construction would be approximately 65 dBA at the nearest offsite residences, while noise associated with operation and maintenance of the vineyard would be between 55 and 60 dBA. As stated in that section, the anticipated noise levels associated with project development and operation are considered typical and reasonable for agricultural development and operational activities, consistent with the County's "Right to Farm" Ordinance (NCC Chapter 2.94 and General Plan Agricultural Preservation and Land Use Policy AG/LU-15). NCC Section 8.16.090(E) (Exemptions to Noise Regulations) exempts agricultural operations from noise regulations.

Response to Comment 1.2: The comment references 2022 California Fire Code Appendix D. Provisions within Appendix D are not mandatory unless specifically referenced in the adopting ordinance; only Appendices B & C have been adopted by Napa County – see Napa County Code Section 15.32.010 & 15.32.070. The governing regulations regarding access are the State Minimum Fire Safe Regulations (Title 14, Division 1.5, Chapter 7, Subchapter 2) and these are enacted through the Napa County Road and Street Standards. Roads used for agriculture are not subject to these design standards (14 CCR §1270.03 (d)).

Response to Comment 1.3: While the County considers easements in connection with development applications/proposals, the County is not responsible for interpreting or enforcing the terms of easement agreements or other private property matters. Neither County Staff nor the Board of Supervisors have authority to resolve private easement disputes, and the County has a long-standing policy of not adjudicating private easement matters. The courts are the appropriate venue for obtaining clarity regarding an easement's validity and/or use restrictions with a private easement. Staff encourage parties to resolve any questions regarding property easements prior to submitting land use applications, so that any underlying private property encumbrances do not result in civil disputes, but there is no State or County requirement that potential private easement issues be resolved prior to submitting a land use application or through its processing.

List of Attachments

Attachment 1 – Daniel Skeoch comment letter via email dated September 10, 2025.

From: [Dan Skeoch](#)
To: [Arifian, Pamela](#)
Date: Thursday, September 11, 2025 8:35:12 PM

[External Email - Use Caution]

Pamela,

Please find attached my letter of comment regarding the Matthes Vineyard Development.

Please acknowledge receipt of this email and the attached letter.

Thank you for your assistance.

Sincerely,

Daniel Skeoch

1195 Third Street, Suite 2110, Napa, CA

01 SKEOCH

Attention : Pamela Arifian

Re: Matthes Vineyard Development Plan #P21-00047-ECPA

Dear Ms. Arifian,

I am the owner of parcels # 025-420-002 and parcel # 025-420-003 both of which adjoin the lands of Matthes on which he is proposing to develop vineyards.

An easement which services his property crosses my properties very near my home. I am concerned about the effects of this development on my property in general and on this easement in particular. The specific concerns are as follows:

1. As per your notice of August 14, the average slope of the proposed vineyards is 23% with areas of slope as great as 28%. I, therefore, expect that major terracing will be required to prepare the land for planting. I am concerned that the tractor and truck work required will take an extended period of time and that this construction may well result in noise levels which exceed the 80 dBA level permitted under Napa County code #8.16.080. 1.1
2. The California Fire Code section 2022, appendix D, the authority of which supersedes that of local agencies, permits a maximum grade of 16% for access roads. There are several lengths of the easement which significantly exceed this degree of slope. 1.2
3. Approximately 450 linear feet of the easement is paved and serves as the driveway to our home. This driveway was not improved or paved until after construction of our home was completed to avoid damage to the driveway during the construction process. The driveway was not designed nor constructed to withstand heavy construction traffic. I am fearful that the large tractor and many heavy trucks needed to perform the proposed grading will badly damage the driveway. 1.3

Thank you for your consideration in this matter,

Sincerely,



Daniul U. Skeoch