

Exhibit D

SOIL LOSS ANALYSIS, revised
KELLER VINEYARD
NEW VINEYARD DEVELOPMENT
275 LONG RANCH ROAD
ST. HELENA, CA 94574
APN 032-030-070
MARCH 14, 2025



The following analysis evaluates the proposed development of approximately 16.7 acres of new vineyard on the referenced, approximately 152.6-acre parcel east of St. Helena, California, to determine the project's potential to increase soil loss or sediment delivery from the site. This analysis was prepared by David Steiner, CPESC, CPSWQ, at the request and under the supervision of Mr. Mike Muelrath, PE, of Applied Civil Engineering. The analysis has adapted the Universal Soil Loss Equation (USLE) protocol developed by the Napa RCD, with guidance from the NRCS (SCS) Field Office Technical Guide, to requirements of the Napa County Engineering Division. The transects modeled were drawn on the accompanying map, provided by Applied Civil Engineering. The accompanying Excel spreadsheet¹ incorporates USLE principles and formulas, as follows:

- The “R” (rainfall) value is derived from the median value of the predicted range of 2-year/6-hour storms for this site, according to NOAA Atlas 14. A printout of the NOAA Atlas 14 table for the site accompanies this analysis.
- The “K” (soil erosivity) and “T” (soil loss tolerance) values were taken from the Napa County Web Soil Survey.
- The “LS” (slope length) value is calculated per algorithms based on USDA empirical data, using plotted slope lengths and gradients, over four representative transects through the proposed vineyard areas.
- Pre-project “C”: Cover values were assigned based on a site inspection on August 13, 2024, and examination of aerial photographic imagery (Google Earth and the Napa County GIS).
 - Transect A-1
 - Segment 1-3: 75% Low Brush; 70% cover: 20G, 80W
 $C = .022 \times .2 + .053 \times .8 = .0468$
 - Segment 4: 50% Low brush; 70% cover: 20G, 80W
 $C = .024 \times .2 + .058 \times .8 = .0512$

¹ This Excel format segments modeled transects according to the most complex variable or USLE factor describing conditions along the transect. For example, a transect with five different types or levels of canopy or vegetative cover—but with uniform slope throughout—would nonetheless be assigned five separate slope entries (even though they were all the same), as the transect's segmentation (for all factors) would be based on cover, its most complex variable.

- Transect A-2
 - Segment 1: 75% Low brush; 70% cover: 20G, 80W
 $C = .022 \times .2 + .053 \times .8 = .0468$
 - Segment 2: 75% low brush; 70% cover: 60G, 40 W
 $C = .022 \times .6 + .053 \times .4 = .0344$
- Transect B
 - Segment 1: 50% Low Brush; 60% cover: 70G, 30W
 $C = .035 \times .7 + .076 \times .3 = .0473$
 - Segment 2: 50% Low Brush; 60% cover: 60G, 40W
 $C = .035 \times .6 + .076 \times .4 = .0514$
- Transect C
 - Segments 1 and 2: 75% Low Brush; 70% cover: 30G, 70W
 $C = .022 \times .3 + .053 \times .7 = .0437$
- **Post-project C** values, are based on the cover specifications of the Erosion Control Plan, calling for 75% non-tilled cover in Block A ($C = .034$) and 80% non-tilled cover ($C = .022$) in Blocks B and C.²
- Pre- and post-project “P” values are assigned the default maximum (1.00), indicating proposed row direction up- and down-hill, that is, no “practice” reduction in soil loss.

Conclusion: With the assumption that the specified cover levels will be maintained, calculations predict that the net soil loss in each of the vineyard blocks will not exceed pre-project levels. (Please see accompanying Excel printouts.)

² Tillage is an option in the ECP-exempt, <5% slope, existing vineyard areas that lie within the boundaries of the proposed Block A.

Keller, revised
Pre-Project USLE
2-yr/6-hr storm, inches 1.87
March 12, 2025

Transect Identification		A-1, pre				
Acres		7.5	acres			
Total Slope Length		624	feet			
Number of Segments		4	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.12	0.23	0.30	0.35	0.00	
Slope Length	624	624	624	624		
Slope %	5.6	4.7	9.2	18.6		
LS	1.54	1.24	3.02	7.89	0.00	
K	0.10	0.10	0.10	0.10		
C	0.047	0.047	0.047	0.051		
P	1.00	1.00	1.00	1.00		
T	1.00	1.00	1.00	1.00		1.00
(F) (LS) (K) (C)	0.000863	0.0013	0.0042	0.0141	0.0000	0.0206
A = (R) (F) (LS) (K) (C) (P)	0.06	0.09	0.27	0.91	0.00	1.32

tons/acre/year
9.93 tons/year

Keller, revised
Post-Project USLE
2-yr/6-hr storm, inches
March 12, 2025

Transect Identification		A-1, post				
Acres		7.5	acres			
Total Slope Length		624	feet			
Number of Segments		4	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.12	0.23	0.30	0.35	0.00	
Slope Length	624	624	624	624		
Slope %	5.6	4.7	9.2	18.6		
LS	1.54	1.24	3.02	7.89	0.00	
K	0.10	0.10	0.10	0.10		
C	0.034	0.034	0.034	0.034		75, no-till
P	1.00	1.00	1.00	1.00		
T	1.00	1.00	1.00	1.00		1.00
(F) (LS) (K) (C)	0.000627	0.0010	0.0031	0.0094	0.0000	0.0141
A = (R) (F) (LS) (K) (C) (P)	0.04	0.06	0.20	0.60	0.00	0.90

tons/acre/year
6.79 tons/year

Transect Identification		A-2, pre				
Acres		3.8	acres			
Total Slope Length		520	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	520	520				
Slope %	10.8	22.8				
LS	3.44	9.42	0.00	0.00	0.00	
K	0.10	0.10				
C	0.047	0.034				
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.005628	0.0211	0.0000	0.0000	0.0000	0.0267
A = (R) (F) (LS) (K) (C) (P)	0.36	1.36	0.00	0.00	0.00	1.72

tons/acre/year
6.53 tons/year

Transect Identification		A-2, post				
Acres		3.8	acres			
Total Slope Length		520	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	520	520				
Slope %	10.8	22.8				
LS	3.44	9.42	0.00	0.00	0.00	
K	0.10	0.10				
C	0.034	0.034				75, no-till
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.004089	0.0208	0.0000	0.0000	0.0000	0.0249
A = (R) (F) (LS) (K) (C) (P)	0.26	1.34	0.00	0.00	0.00	1.60

tons/acre/year
6.09 tons/year

Transect Identification		B, pre				
Acres		3.7	acres			
Total Slope Length		433	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	433	433				
Slope %	21.3	19.1				
LS	7.86	6.81	0.00	0.00	0.00	
K	0.10	0.10				
C	0.047	0.051				
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.01302	0.0227	0.0000	0.0000	0.0000	0.0358
A = (R) (F) (LS) (K) (C) (P)	0.84	1.46	0.00	0.00	0.00	2.30

tons/acre/year
8.52 tons/year

Transect Identification		B, post				
Acres		3.7	acres			
Total Slope Length		433	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	433	433				
Slope %	21.3	19.1				
LS	7.86	6.81	0.00	0.00	0.00	
K	0.10	0.10				
C	0.022	0.022				80, no-till
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.006056	0.0097	0.0000	0.0000	0.0000	0.0158
A = (R) (F) (LS) (K) (C) (P)	0.39	0.63	0.00	0.00	0.00	1.02

tons/acre/year
3.76 tons/year

Transect Identification		C, pre				
Acres		1.7	acres			
Total Slope Length		278	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	278	278				
Slope %	10.8	20.2				
LS	2.51	5.88	0.00	0.00	0.00	
K	0.10	0.10				
C	0.044	0.044				
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.003842	0.0168	0.0000	0.0000	0.0000	0.0206
A = (R) (F) (LS) (K) (C) (P)	0.25	1.08	0.00	0.00	0.00	1.33

tons/acre/year
2.26 tons/year

Transect Identification		C, post				
Acres		1.7	acres			
Total Slope Length		278	feet			
Number of Segments		2	segments			
	1	2	3	4	5	
R	64.37	64.37	64.37	64.37	64.37	
Factor (F)	0.35	0.65	0.00	0.00	0.00	
Slope Length	278	278				
Slope %	10.8	20.2				
LS	2.51	5.88	0.00	0.00	0.00	
K	0.10	0.10				
C	0.022	0.022				80, no-till
P	1.00	1.00				
T	1.00	1.00				1.00
(F) (LS) (K) (C)	0.001934	0.0084	0.0000	0.0000	0.0000	0.0103
A = (R) (F) (LS) (K) (C) (P)	0.12	0.54	0.00	0.00	0.00	0.67

tons/acre/year
1.13 tons/year

6-hr	1.52 (1.36-1.73)	1.87 (1.66-2.12)	2.31 (2.05-2.64)	2.67 (2.34-3.07)	3.14 (2.65-3.75)	3.49 (2.88-4.27)	3.84 (3.08-4.84)	4.20 (3.26-5.46)	4.67 (3.46-6.36)	5.02 (3.58-7.12)
12-hr	2.16 (1.92-2.45)	2.69 (2.39-3.05)	3.36 (2.98-3.83)	3.90 (3.42-4.48)	4.60 (3.89-5.50)	5.13 (4.23-6.28)	5.65 (4.53-7.12)	6.17 (4.80-8.03)	6.86 (5.08-9.35)	7.38 (5.26-10.5)
24-hr	3.01 (2.71-3.42)	3.83 (3.44-4.35)	4.86 (4.36-5.53)	5.67 (5.05-6.50)	6.75 (5.85-7.95)	7.55 (6.43-9.04)	8.34 (6.96-10.2)	9.13 (7.45-11.4)	10.2 (8.01-13.2)	11.0 (8.38-14.6)
2-day	3.96 (3.56-4.49)	5.06 (4.54-5.74)	6.46 (5.79-7.36)	7.58 (6.75-8.68)	9.04 (7.84-10.7)	10.1 (8.64-12.2)	11.2 (9.37-13.7)	12.3 (10.1-15.4)	13.8 (10.8-17.8)	14.9 (11.4-19.8)
3-day	4.62 (4.15-5.24)	5.92 (5.32-6.72)	7.58 (6.80-8.63)	8.90 (7.93-10.2)	10.6 (9.23-12.5)	12.0 (10.2-14.3)	13.3 (11.1-16.2)	14.6 (11.9-18.2)	16.3 (12.8-21.1)	17.6 (13.5-23.5)
4-day	5.13 (4.61-5.82)	6.59 (5.92-7.48)	8.45 (7.57-9.61)	9.92 (8.83-11.4)	11.9 (10.3-14.0)	13.3 (11.3-16.0)	14.8 (12.3-18.0)	16.2 (13.2-20.3)	18.1 (14.3-23.5)	19.6 (15.0-26.1)
7-day	6.33 (5.69-7.18)	8.13 (7.30-9.23)	10.4 (9.33-11.8)	12.2 (10.9-14.0)	14.6 (12.6-17.1)	16.3 (13.9-19.5)	18.0 (15.0-22.0)	19.7 (16.1-24.7)	21.9 (17.3-28.4)	23.6 (18.1-31.5)
10-day	7.13 (6.42-8.09)	9.17 (8.24-10.4)	11.7 (10.5-13.3)	13.7 (12.2-15.7)	16.3 (14.1-19.2)	18.2 (15.5-21.8)	20.1 (16.8-24.6)	21.9 (17.9-27.5)	24.3 (19.2-31.5)	26.1 (20.0-34.8)
20-day	9.33 (8.39-10.6)	12.0 (10.8-13.6)	15.3 (13.7-17.4)	17.9 (15.9-20.5)	21.1 (18.3-24.9)	23.5 (20.0-28.1)	25.8 (21.5-31.5)	28.0 (22.8-35.0)	30.8 (24.2-39.9)	32.8 (25.1-43.8)
30-day	11.3 (10.2-12.8)	14.5 (13.0-16.5)	18.4 (16.5-21.0)	21.4 (19.1-24.5)	25.2 (21.8-29.7)	27.9 (23.7-33.4)	30.5 (25.4-37.2)	33.0 (26.9-41.2)	36.1 (28.4-46.8)	38.3 (29.3-51.1)
45-day	13.7 (12.4-15.6)	17.5 (15.8-19.9)	22.1 (19.8-25.2)	25.6 (22.8-29.3)	29.9 (25.9-35.2)	33.0 (28.1-39.5)	35.9 (29.9-43.8)	38.6 (31.5-48.3)	42.1 (33.1-54.5)	44.5 (34.1-59.4)
60-day	16.4 (14.8-18.6)	20.8 (18.7-23.6)	26.0 (23.3-29.6)	29.9 (26.6-34.3)	34.7 (30.1-40.9)	38.1 (32.5-45.7)	41.3 (34.5-50.5)	44.4 (36.2-55.5)	48.1 (37.9-62.4)	50.8 (38.9-67.7)

¹ Precipitation frequency (PF) estimates in this table are based on frequency analysis of partial duration series (PDS).

Numbers in parenthesis are PF estimates at lower and upper bounds of the 90% confidence interval. The probability that precipitation frequency estimates (for a given duration and average recurrence interval) will be greater than the upper bound (or less than the lower bound) is 5%. Estimates at upper bounds are not checked against probable maximum precipitation (PMP) estimates and may be higher than currently valid PMP values.

Please refer to NOAA Atlas 14 document for more information.

Estimates from the table in CSV format: [Precipitation frequency estimates](#)

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National Oceanic and Atmospheric Administration
National Weather Service
Office of Water Prediction (OWP)
1325 East West Highway
Silver Spring, MD 20910
Page Author: [HDSC webmaster](#)
Page last modified: April 21, 2017

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K Factor, Rock Free

K Factor, Whole Soil

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Map ☒

Table ☒

Description of Rating ☒

Rating Options ☒

☐ Detailed Description

Advanced Options

Aggregation Method **Dominant Condition**

Component Percent Cutoff

Tie-break Rule

☐ Lower

☒ Higher

Layer Options (Horizon Aggregation Method)

☒ Surface Layer (Not applicable)

☐ Depth Range (Weighted Average)

Top Depth

Bottom Depth

☐ Inches

☐ Centimeters

☐ All Layers (Weighted Average)

[View Description](#) [View Rating](#)

T Factor

Wind Erodibility Group

Wind Erodibility Index

Soil Health Properties

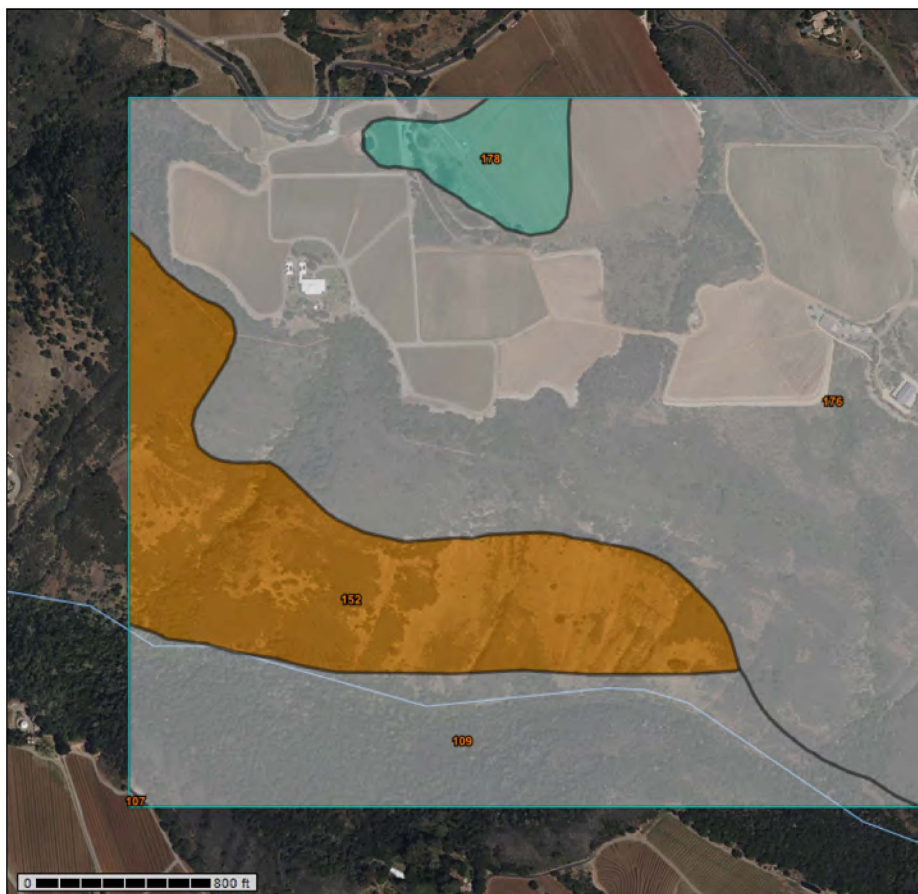
Soil Physical Properties

Soil Qualities and Features

Water Features

Map — K Factor, Whole Soil

[Map](#) [Layers](#) [Legend](#) [Scale](#) (not to scale)



Warning: Soil Ratings Map may not be valid at this scale.

You have zoomed in beyond the scale at which the soil map for this area is intended to be used. Maps that comprise your AOI were mapped at 1:24,000. The design of map units and the level of detail at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of map that show the small areas of contrasting soils that could have been shown at a more detailed scale.

Tables — K Factor, Whole Soil — Summary By Map Unit

Summary by Map Unit — Napa County, California (CA055)				
Summary by Map Unit — Napa County, California (CA055)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
107	Boomer loam, volcanic bedrock, 2 to 35 percent slopes, MLRA 15		0.1	0.0%
109	Boomer gravelly loam, volcanic bedrock, 14 to 60 percent slopes, MLRA 15		46.1	11.3%
152	Hambright rock-Outcrop complex, 30 to 75 percent slopes	.10	49.5	12.2%
176	Rock outcrop-Hambright complex, 50 to 75 percent slopes		302.4	74.3%
178	Sobrante loam, 5 to 30 percent slopes	.32	8.9	2.2%
Totals for Area of Interest			407.0	100.0%

Description — K Factor, Whole Soil

Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. Factor K is one of six factors used in the Universal Soil Loss Equation (USLE) and the Revised Universal Soil Loss Equation (RUSLE) to predict the average annual rate of soil loss by sheet and rill erosion in tons per acre per year. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity (Ksat). Values of K range from 0.02 to 0.69. Other factors being equal, the higher the value, the more susceptible the soil is to sheet and rill erosion by water.

"Erosion factor Kw (whole soil)" indicates the erodibility of the whole soil. The estimates are modified by the presence of rock fragments.

Factor K does not apply to organic horizons and is not reported for those layers.

Rating Options — K Factor, Whole Soil

Aggregation Method: Dominant Condition

Component Percent Cutoff: *None Specified*

Tie-break Rule: Higher

Layer Options (Horizon Aggregation Method): Surface Layer (Not applicable)

Area of Interest (AOI) | Soil Map | **Soil Data Explorer** | Download Soils Data | Shopping Cart (Free)

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Soil Chemical Properties

Soil Erosion Factors

K Factor, Rock Free

K Factor, Whole Soil

T Factor

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View Options

Map ☒

Table ☒

Description of Rating ☒

Rating Options

☐ Detailed Description

Advanced Options

Aggregation Method Dominant Condition

Component Percent Cutoff

Tie-break Rule ☒ Lower ☐ Higher

Interpret Nulls as Zero ☐ Yes ☒ No

[View Description](#) [View Rating](#)

Wind Erodibility Group

Wind Erodibility Index

Soil Health Properties

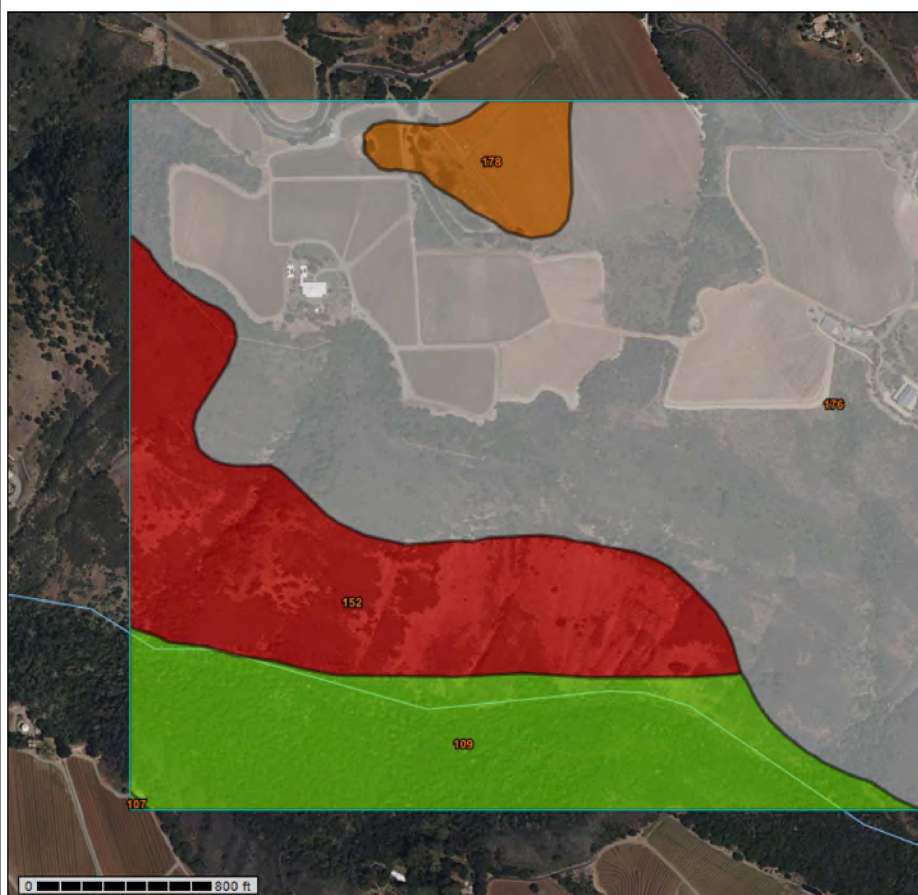
Soil Physical Properties

Soil Qualities and Features

Water Features

Map — T Factor

Scale (not to scale)



Warning: Soil Ratings Map may not be valid at this scale.

You have zoomed in beyond the scale at which the soil map for this area is intended to be used. Maps that comprise your AOI were mapped at 1:24,000. The design of map units and the level of detail shown are not valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of map shown. The small areas of contrasting soils that could have been shown at a more detailed scale.

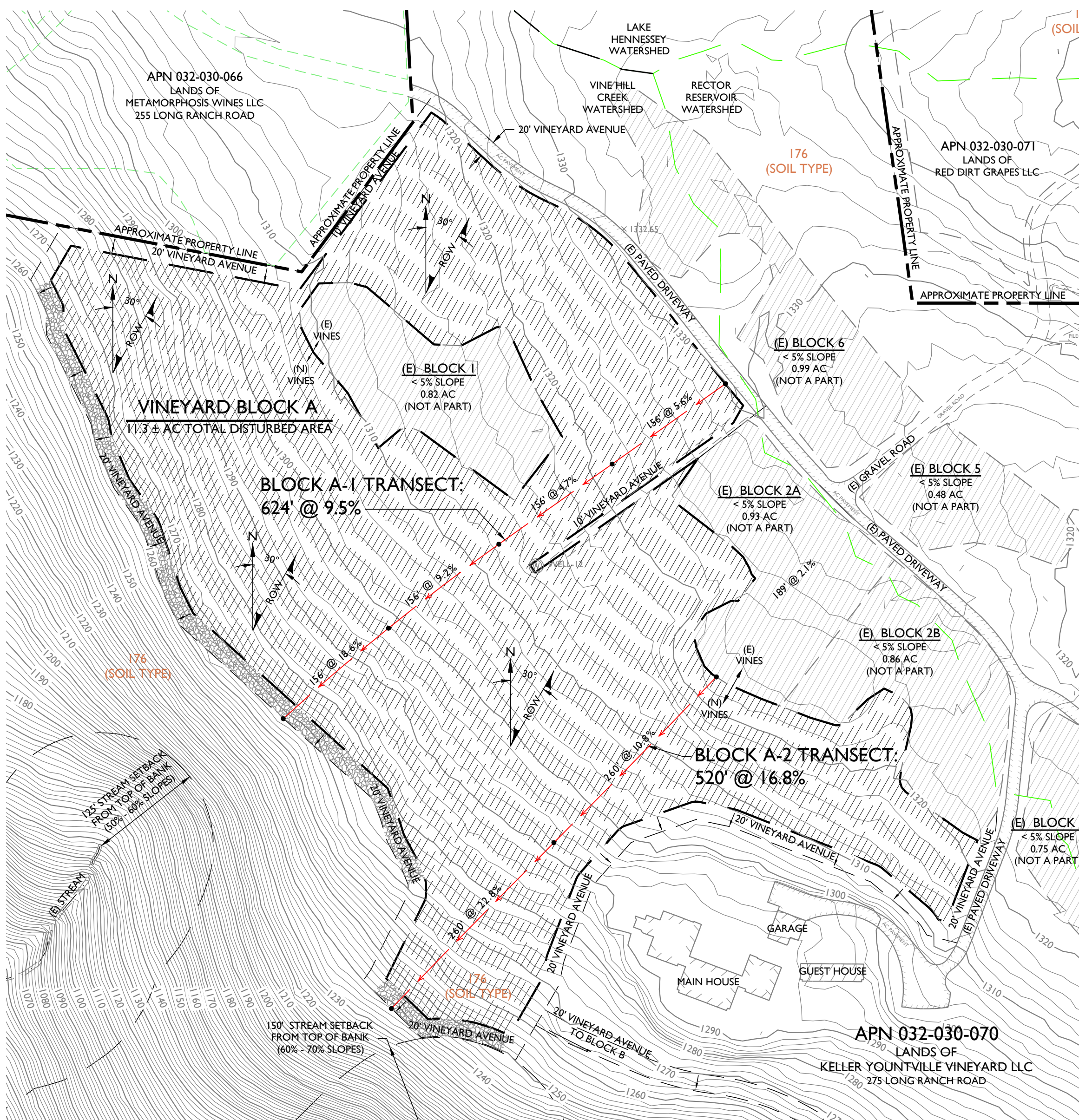
Tables — T Factor — Summary By Map Unit

Summary by Map Unit — Napa County, California (CA055)				
Summary by Map Unit — Napa County, California (CA055)				
Map unit symbol	Map unit name	Rating (tons per acre per year)	Acres in AOI	Percent of AOI
107	Boomer loam, volcanic bedrock, 2 to 35 percent slopes, MLRA 15	4	0.1	0.0%
109	Boomer gravelly loam, volcanic bedrock, 14 to 60 percent slopes, MLRA 15	4	46.1	11.3%
152	Hambright rock-Outcrop complex, 30 to 75 percent slopes	1	49.5	12.2%
176	Rock outcrop-Hambright complex, 50 to 75 percent slopes		302.4	74.3%
Totals for Area of Interest			407.0	100.0%

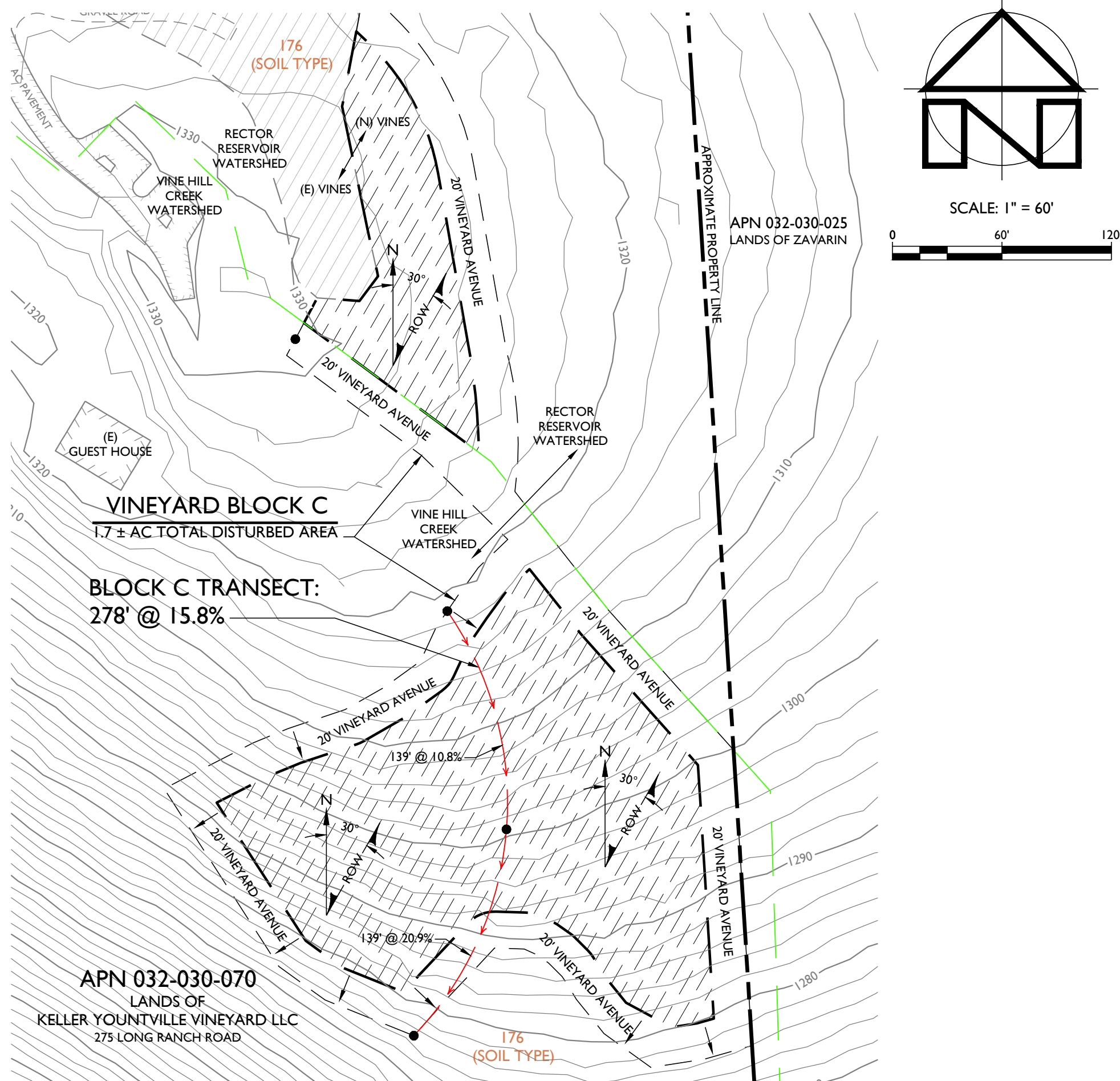
Summary by Map Unit — Napa County, California (CA055)				
Map unit symbol	Map unit name	Rating (tons per acre per year)	Acres in AOI	Percent of AOI
178	Sobrante loam, 5 to 30 percent slopes	2	8.9	2.2%
Totals for Area of Interest			407.0	100.0%
Description — T Factor				
The T factor is an estimate of the maximum average annual rate of soil erosion by wind and/or water that can occur without affecting crop productivity over a sustained period. The rate is in tons per acre per year.				
Rating Options — T Factor				
Units of Measure: tons per acre per year Aggregation Method: Dominant Condition Component Percent Cutoff: <i>None Specified</i> Tie-break Rule: Lower Interpret Nulls as Zero: No				

KELLER YOUNTVILLE VINEYARD LLC

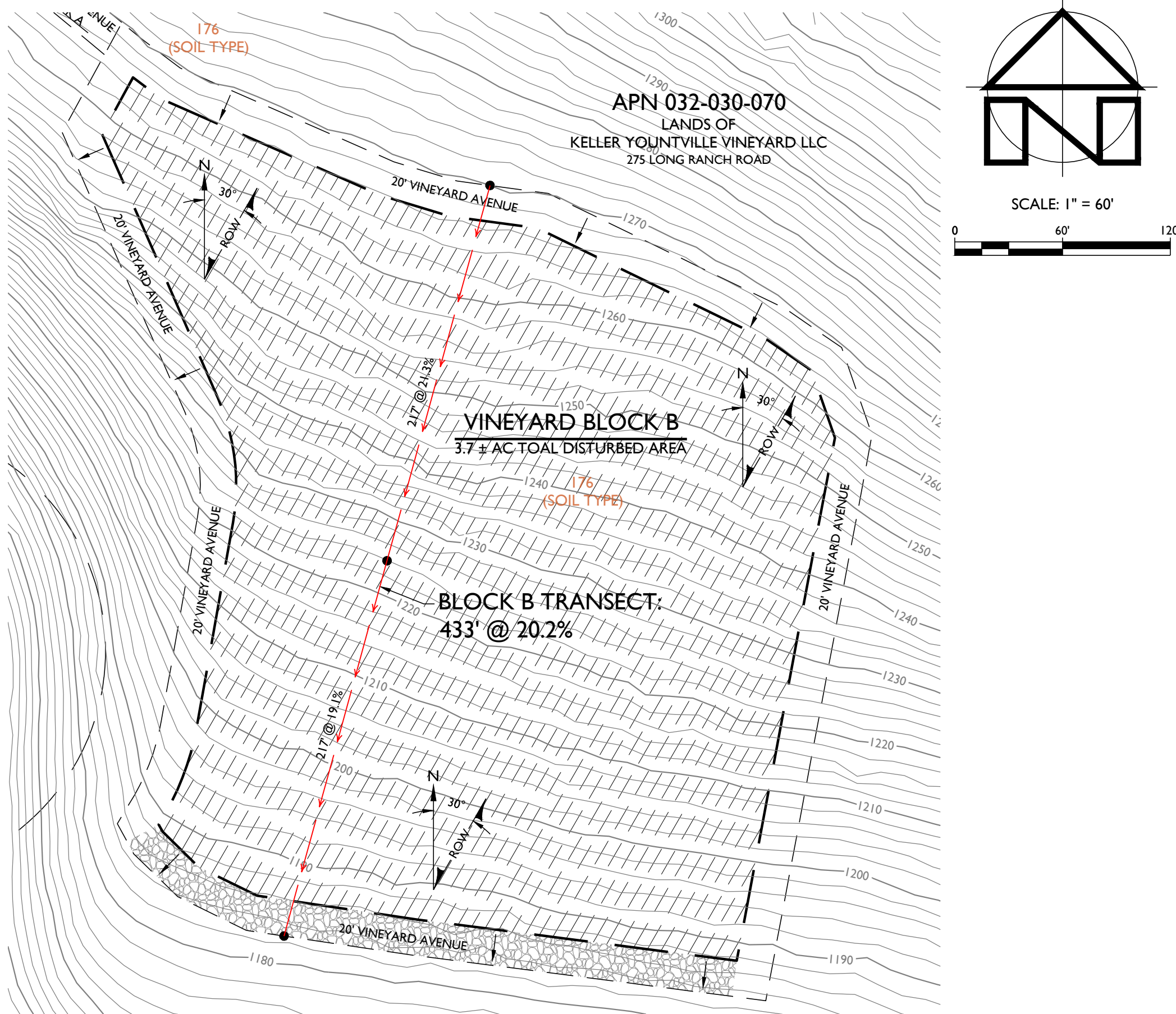
UNIVERSAL SOIL LOSS EQUATION EXHIBIT



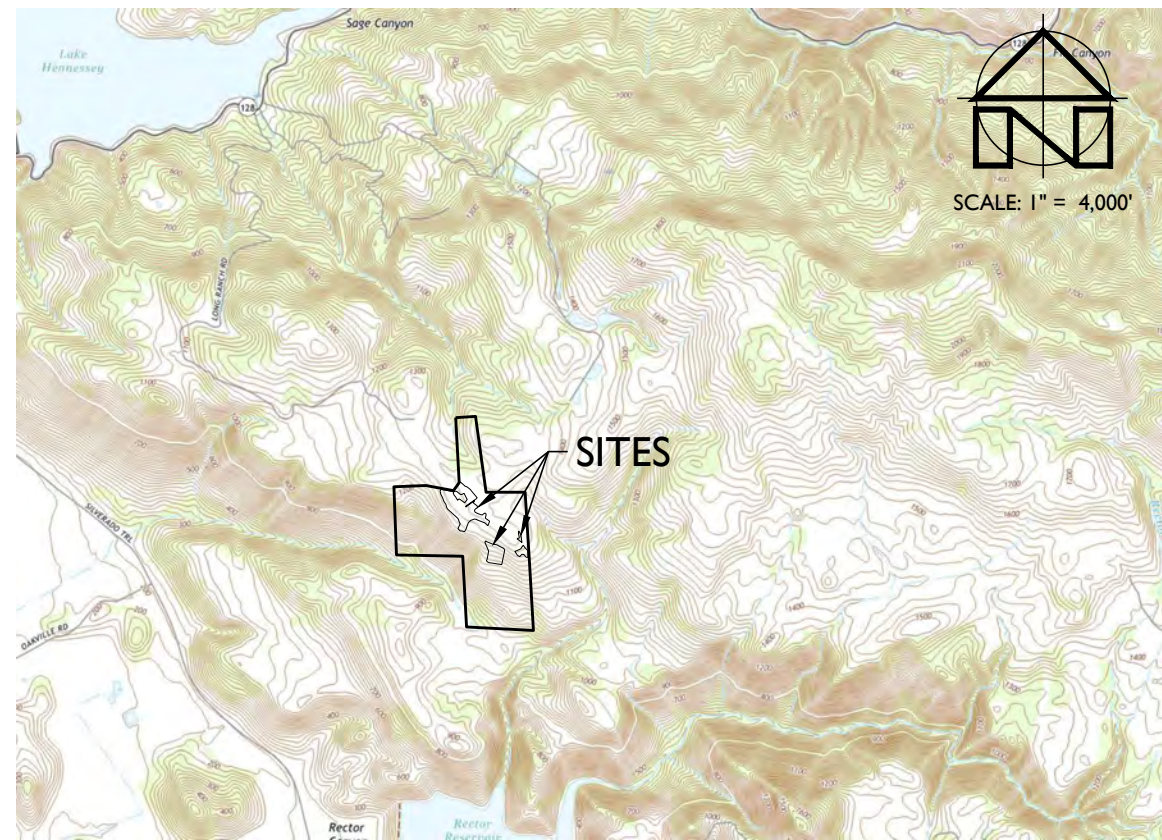
VINEYARD BLOCK A
SCALE: 1" = 100'



VINEYARD BLOCK C
SCALE: 1" = 60'



VINEYARD BLOCK B
SCALE: 1" = 60'



LOCATION MAP
SCALE: 1" = 4,000'

PROJECT INFORMATION:

PROPERTY OWNER & APPLICANT:
KELLER YOUNTVILLE VINEYARD LLC
POST OFFICE BOX 546
NAPA, CA 94559

SITE ADDRESS:
275 LONG RANCH ROAD
SAINT HELENA, CA 94574

ASSESSOR'S PARCEL NUMBER:
032-030-070

PARCEL SIZE:
152.6 ± ACRES

PROJECT SIZE:
19.0 ± ACRES DISTURBED AREA
16.0 ± ACRES PLANTED

ZONING:
AGRICULTURAL WATERSHED (AW)

FLOOD HAZARD NOTE:

ACCORDING TO THE FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) FLOOD INSURANCE RATE MAP (FIRM) MAP NUMBER 06055C0405E, EFFECTIVE SEPTEMBER 26, 2008, THE PROJECT SITE IS NOT LOCATED IN A SPECIAL FLOOD HAZARD AREA.

NOTES:

- FADED BACKGROUND REPRESENTS EXISTING TOPOGRAPHIC FEATURES. TOPOGRAPHIC INFORMATION WAS TAKEN FROM ELEVATION DATA DERIVED FROM BARE-EARTH SURFACE DIGITAL ELEVATION MODELS (DEMS) CREATED FROM LIDAR DATA FLOWN IN 2018 IN RESPONSE TO THE WIDESPREAD 2017 FIRES IN NORTHERN CALIFORNIA AS PART OF ONGOING NATIONWIDE 3DEP (U.S. GEOLOGICAL SURVEY 3D ELEVATION PROGRAM) EFFORTS. APPLIED CIVIL ENGINEERING INCORPORATED ASSUMES NO LIABILITY REGARDING THE ACCURACY OR COMPLETENESS OF THE TOPOGRAPHIC INFORMATION.
- CONTOUR INTERVAL: TWO (2) FEET, HIGHLIGHTED EVERY TEN (10) FEET.
- VERTICAL DATUM: NAVD 88

LEGEND:

- APPROXIMATE PROPERTY LINE
- SOIL TYPE BOUNDARY
- BLUE LINE STREAM
- PROPOSED VINEYARD AVENUE / LIMIT OF GRADING
- PROPOSED VINEYARD BLOCK / LIMIT OF RIPPING
- VINE ROWS / VINE ROW DIRECTION
- TRANSECT SEGMENTS

SOIL TYPE LEGEND:

176 ROCK OUTCROP - HAMBRIGHT COMPLEX, 50% TO 75% SLOPES.

SOIL TYPE BOUNDARIES SHOWN ON THIS MAP ARE BASED ON THE NAPA COUNTY GEOGRAPHIC INFORMATION SYSTEM DATA AND SHOULD BE CONSIDERED APPROXIMATE.

PREPARED UNDER THE
DIRECTION OF:



DRAWN BY:
PowerCAD LLC

CHECKED BY:
MRM

DATE:
MARCH 14, 2025

REVISIONS: BY:
3/14/2025 YMS
PERMIT SUBMITTAL

JOB NUMBER:
23-123

FILE:
23-123EXH-USLE.DWG

ORIGINAL SIZE:
24" X 36"

SHEET NUMBER: