

EXHIBIT B-2



May 8, 2019

Donald Barrella, Planner III
County of Napa
Planning, Building, and Environmental Services
1195 Third Street, Suite 210
Napa, California 94559

RE: Wappo Land Company, Napa County ECP – Response to Napa County comments on biological resources (File #P19-00037-ECPA)

Dear Mr. Barrella:

This letter provides a response to a request from Napa County for additional information/analysis regarding biological resources for the property located at 135 Long Ranch Road (APNs 030-220-044, -043) near Saint Helena in unincorporated Napa County, California. The request is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Completeness Determination – Wappo Land Company Agricultural Erosion Control Plan (ECPA) File #P19-00037-ECPA*. The request was made in the context of a previous Biological Resources Reconnaissance Survey (BRRS) report covering the site/project by WRA, Inc. (WRA) dated February 2019. This letter is effectively an addendum to WRA's February 2019 report, the purpose of which is to address the County's request. An additional clarification to the BRRS report regarding the installation of an on-site water line is also provided herein.

The proposed project is the installation of new vineyard blocks on the property. Revised figures specific to the project parcel (see item *iv.* below) are included as Attachment A.

Response to County Request

In the context of the recommended changes to the vineyard expansion as outlined above, the section below directly addresses the comments from the County point-by-point (with text from the County in *italics*); the relevant pages from the County's letter are included as Attachment B.

2. Supplemental Environmental Information...

a. Biological Resource Information...

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i. Recommended buffers, including rationale, for special-status plant populations and habitat.

The majority of the on-site populations of special-status plants will be 50 feet or greater from vineyard edges, providing ample distance to buffer the species from vineyard activities. The proposed Preservation Area leaves intact a blocks of habitat supporting these species that will ensure buffering from grading effects, dust and sediment migration, and the presence of non-native/invasive plant species. It is important to note that an existing chamise chaparral habitat conservation area of 4.76 acres is located on the adjacent property immediately east of the Proposed Preservation Area (APN 032-010-071; Erosion Control Plan 98328, approved April 22, 2003). The contiguous preservation areas will provide a undisturbed and protected habitat of greater than 7 acres, further protecting the special-status plants on both parcels. Narrow-anthered brodiaea (*Brodiaea leptandra*, CRPR 1B) and Sharsmith's western flax (*Hesperolinon sharsmithiae*, CRPR 1B) benefit from ground disturbance; WRA biologists have observed these species on the thresholds of vineyard avenues (as well as in other disturbed substrates) in Napa County, and believe that they will likely re-emerge in vineyard avenues within the Study Area where they are present currently. Similarly, holly-leaved ceanothus (*Ceanothus purpureus*, CRPR 1B) is tolerant of disturbance and is also anticipated to regenerate in vineyard avenues, though maintenance activities will presumably limit the growth and development of individual ceanothus shrubs within the avenues. Peripheral remnant individuals of all of these species within the designated Proposed Preservation Area are unlikely to be negatively affected by the new vineyards, while those situated deeper within the proposed remnant habitat will be provided with the buffering benefits previously described. Locating the proposed vineyard avenue along the outside periphery of the Proposed Preservation Area sufficiently distances the special-status plants from direct vineyard activities to promote regeneration and continued growth within the Preservation Area.

The on-site populations of green monardella (*Monardella viridis*, CRPR 4), Greene's narrow-leaved daisy (*Erigeron greenei*, CRPR 1B), and nodding harmonia (*Harmonia nutans*, CRPR 4) are located a minimum distance of 600 feet from the proposed vineyard developments, on the south side of Long Ranch Road. All populations of these species, as well a substantial portion of on-site holly-leaved ceanothus populations, are within the proposed Oak Woodland Preservation Area.

ii. A discussion of the habitat quality and value of the Biological Communities within the proposed Preservation Areas as compared to the proposed development areas.

The subject parcel is primarily composed of chaparral communities, respectively dominated by chamise and interior live oak (Figure 1). Much of this chaparral, particularly the former community, supports both a diversity and relative high density of special-status plants. The proposed Preservation Area has been located to retain and preserve the highest on-site abundances of narrow-anthered brodiaea and Sharsmith's western flax (Figure 2), and as a result constitutes highly valuable habitat for conservation purposes relative to the development area. The Proposed Preservation Area is also adjacent to and contiguous with the off-site habitat conservation area described above (designated to protect Sharsmith's western flax and holly-leaved ceanothus), which presumably features the same habitats and supports a similar suite of plants, further enhancing the value of the Proposed Preservation Area to the enclosed communities. Connectivity between these contiguous, preserved areas is anticipated to provide favorable conditions for continued cross-pollination and gene flow, resulting in viable populations on the property

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(and more broadly, in the region); this is also true for chaparral areas south of Long Ranch Road.

As noted in the BRRS report, in addition to supporting stands of oaks, the proposed Oak Woodland Preservation Area (south of Long Ranch Road) contains several populations of holly-leaved ceanothus as well as those of three other special-status plants. Both of the on-site streams are also located within the Oak Woodland Preservation Area, further contributing to its habitat diversity and associated high preservation value relative to the proposed development area. (See clarification regarding the Oak Woodland Preservation Area under item *iv* below.)

iii. A discussion and impact analysis of any special-status mosses, bryophytes, and lichens...

Searches of the California Natural Diversity Database (CNDDB; CDFW 2019), California Native Plant Society Electronic Inventory (CNPS 2019), Calflora Electronic Inventory (Calflora 2019), and the Napa County Baseline Data Report (NCBDR; Napa County 2005) result in no documented occurrences of special-status bryophytes or lichens in Napa County. Furthermore, botanical survey guidelines state that it is appropriate to conduct botanical field surveys when special-status plants have been historically identified in a project area and/or the project area contains similar physical and biological properties to know occurrences of special-status in the general vicinity (CDFW 2018). Few special-status bryophytes or lichens as listed in the databases above have been documented from chaparral. As noted above, none have been documented from Napa County or the immediate environs with similar chaparral types.

iv. Updated/Additional Vegetation and Biological Communities and Special-status Plant Species mapping and acreage calculations (i.e. Table 2 and Figure 2 [in the Feb. 2019 report]) that are specific to the project parcel.

Biological communities and special-status plant populations specific to the project parcel (APN 030-220-044) are shown in Figures 1 and 2 respectively. For special-status plants, retention ratios are unchanged at the project-parcel scale with the exception of holly-leaved ceanothus, which exhibits a relatively small decrease from 76 percent (property-wide) to 70 percent. However, the greater Oak Woodland Preservation Area remains proposed as outlined in the BRRS, i.e., an approximately 14.5-acre contiguous area which is primarily located within the project parcel but a portion of which is located in the directly adjacent parcel to the west (APN 030-220-043; same ownership as the project parcel). When included in the total, the Oak Woodland Preservation Area will maintain 76 percent retention for holly-leaved ceanothus. Similarly, at the project-parcel scale the ratio of preserved to impacted coast live oak woodland drops slightly below the stipulated 2:1 ratio (approximately 3.8 acres preserved), but the 2:1 ratio is maintained property-wide within the greater Oak Woodland Preservation Area (approximately 4.3 acres preserved).

Finally, Recommendation 4 in the BRRS (p. 23) concerns the proposed installation of a water line along the northern boundary of the Proposed Preservation Area. This recommendation includes surveying the footprint of the water line for special-status plants prior to ground disturbance, avoiding any such individual plants to the extent feasible (via adjustment of the footprint), and retaining and replacing *en situ* all native soil disturbed during installation. To clarify, water line

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installation should be viewed as a temporary impact to vegetation communities within the Proposed Preservation Area, and it is assumed that the footprint will revert to these communities following installation. As such, no planting or other active management techniques of the footprint are recommended at this time.

Please contact us if you have questions or require additional information.

Sincerely,



Jason Yakich
Senior Biologist
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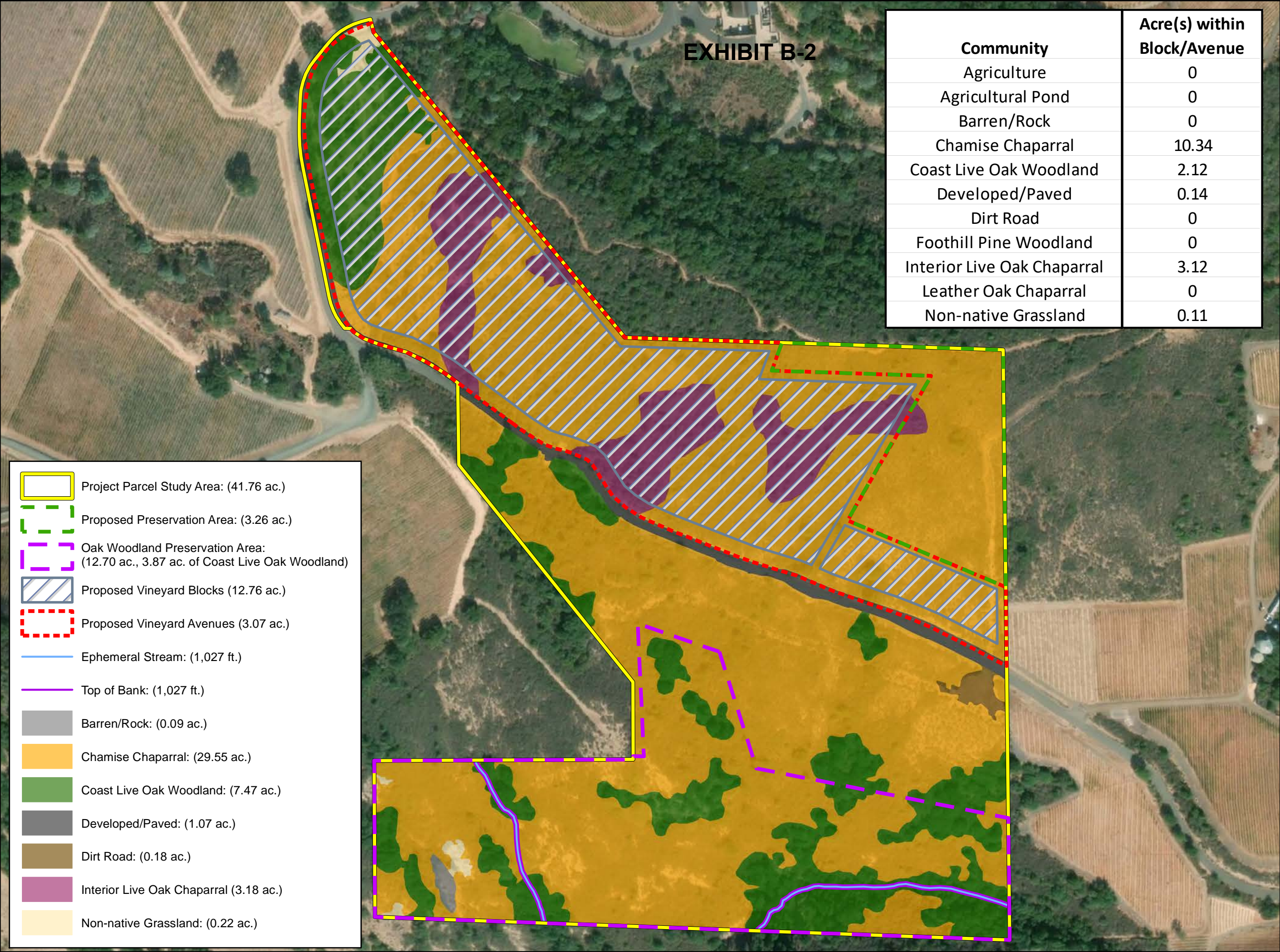
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Enclosures: Attachment A – Figures
Attachment B – Excerpt pages from County letter

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REFERENCES

- Calflora. 2019. Website: Information on wild California plants for conservation, education, and appreciation. Available at: <http://www.calflora.org/>. Accessed: April 2019.
- California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database (CNDDB), Wildlife and Habitat Data Analysis Branch. Sacramento, CA. Accessed: April 2019.
- (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities. California Natural Resources Agency, California Department of Fish and Game. March.
- California Native Plant Society (CNPS). 2019. Online Inventory of Rare, Threatened, and Endangered Plants of California. Available at: <http://www.rareplants.cnps.org/>. Accessed: April 2019.
- Napa County. 2005. Napa County Baseline Data Report. Available at: <http://www.co.napa.us/gov/>.

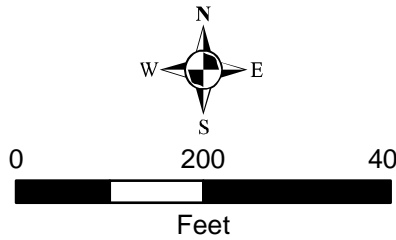


Community	Acre(s) within Block/Avenue
Agriculture	0
Agricultural Pond	0
Barren/Rock	0
Chamise Chaparral	10.34
Coast Live Oak Woodland	2.12
Developed/Paved	0.14
Dirt Road	0
Foothill Pine Woodland	0
Interior Live Oak Chaparral	3.12
Leather Oak Chaparral	0
Non-native Grassland	0.11

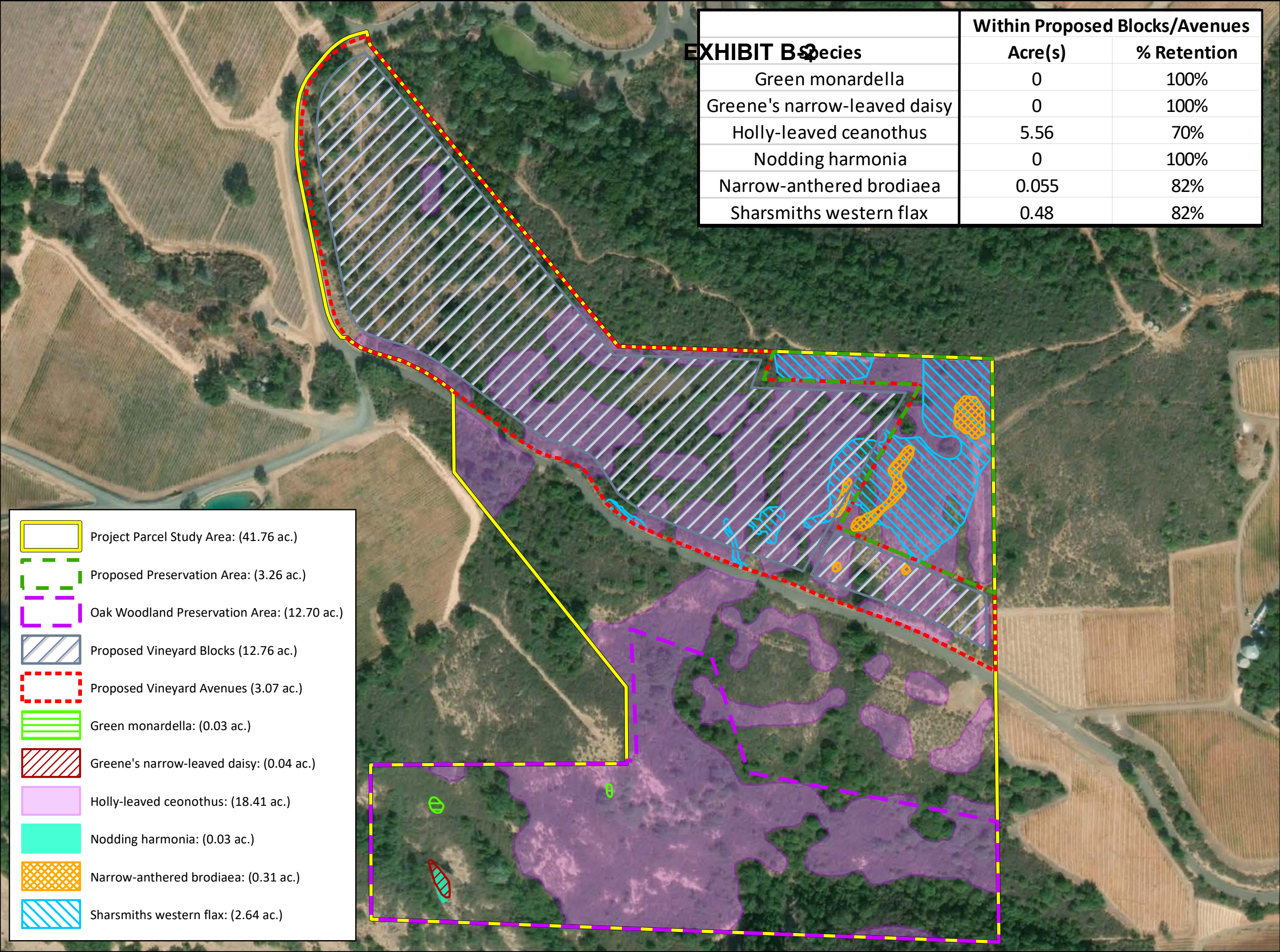



Wappo Land Company,
LLC
Napa County, California

Figure 1.
Biological Communities



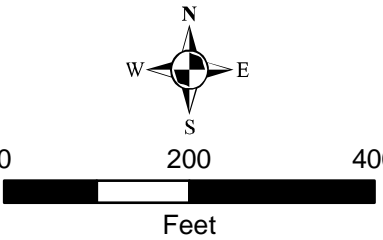
Map Prepared Date: 4/16/2019
Map Prepared By: mrochelle
Base Source: Esri Streaming - NAIP 2016
Data Source(s): WRA





Wappo Land Company,
LLC
Napa County, California

Figure 2.
Special-status
Plants



Map Prepared Date: 4/16/2019
Map Prepared By: mrochelle
Base Source: Esri Streaming - NAIP 2016
Data Source(s): WRA

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EXHIBIT A**APPLICATION COMPLETENESS DETERMINATION – INFORMATION REQUEST**
Wappo Land Company Vineyard Conversion #P19-00037-ECPA: APN 030-220-044

1. Agricultural Erosion Control Plan Application Completeness Items: This information is necessary to clearly describe and understand the full extent of the proposed conversion project and adequately disclose and assess potential impacts of the project pursuant to CEQA.

a. Supplemental ECPA Application Information: Please provide the following:

- i. Water Source and Supply: Clarification of the water source(s) and water supply system for the proposed project. The ECPA Narrative and Water Availability Analysis (RCS January 2019) indicate an existing on-site well (i.e. Parcel 12 Existing Well) and a proposed new on-site well as the source(s); however the ECPA Plans and Biological Resource Assessment (Northwest Biosurvey, December 2018) include details and mitigation language for the installation of an irrigation line to an existing well and tanks located on the adjacent parcel the north (APN 030-220-034: Lands of Prichard Hill Properties LLC). It is our understanding that the well located on the Lands of Prichard Hill is not a project water source, but the tanks are part of the irrigation system for the larger Wappo Land Company holdings, vineyards and winery: APNs 030-220-045, -046, and -047. Please provide documentation that the project has the right to access and utilize the tanks (and well if that is a proposed source) located on the Lands of Prichard Hill. Additionally, please provide a description and/or details on the main irrigation system serving the holding so that it can be understood and adequately disclosed as part of processing and CEQA review.
- ii. Vegetation Retention and Clearing (60/40) Analysis: Please provide an update or addendum to the Vegetation Retention Analysis that accounts for recent vegetation removal located immediately north of the proposed vineyard development. This information is necessary to account for pre and post 1993 conditions, and to maintain an accurate accounting of coverage retention and removal which is required to be based on parcel(s) as configured in 1993 parcel configuration(s), pursuant to NCC Section 18.108.027(B).

b. ECPA Plans and/or Narrative: Please provide revised plans and/or narrative (or addendum thereto) that include, show or clarify the following:

- i. Construction and/or design details of the proposed water line installation indicated in Item #1.a.i above. Also provide the overall area of earth disturbance associated with water line installation, as well as disturbance area (including access roads) associated with the proposed well along with erosion control measures necessary to address grading and earth-disturbing activities related to the water line trench.
- ii. Confirmation that the plans and narrative include all proposed improvements necessary for project implementation such as but not limited to water tanks, utility lines, and storage and staging areas.

2. Supplemental Environmental Information: The following information is necessary for the County to adequately evaluate potentially significant impacts of the proposed project pursuant to CEQA, and to complete the ECPA application to continue its review and processing:

- a. Biological Resource Information: Please provide an addendum or update to the Biological Resource Reconnaissance Survey Report prepared by WRA Environmental Consultants (February 2019) that includes or clarifies the following information:

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- i. Recommended buffers and rationale from special-status plants populations and habitat. Buffers should be large enough to maintain the viability of these special-status plant populations and associated habitat.
 - ii. A discussion of the habitat quality and value of the Biological Communities within the proposed Preservation Areas as compared to the proposed development areas
 - iii. An identification and discussion of any special-status mosses, bryophytes, and lichens that are known to occur in the area as identified in the California Natural Diversity Database (CNDDDB) including a listing of mosses, bryophytes, and lichens occurring or that may occur in the project area.
 - iv. Updated/Additional Vegetation and Biological Communities and Special-Status Plant Species mapping and acreage calculations (i.e. Table 3 and Figure 2) that are specific to the project parcel. Report mapping and acreages includes the abutting parcel to the west (APN 030-220-043: Lands of Wappo Land Company LLC), which is not part of the project.
- b. Water Availability Analysis (WAA): Please provide an update or addendum to the WAA prepared by Richard C. Slade & Associates (RCS – January 2019) that includes or clarifies the information identified below. This information is necessary to conclude that an adequate water supply exists for the proposed project and existing uses and will not result in impacts to the local groundwater aquifer or adjacent wells.
- i. That water use associated pre-irrigation of the proposed cover crop, as specified in the ECPA Plan and Narrative, has been accounted for in the WAA.
 - ii. Clarification of *Key Conclusions and Recommendations* #6, #8 and #9. It is indicated that the project well (Parcel 12 Existing Well) will also periodically serve as a backup well that may utilize the calculated recharge surplus (± 2.4 acre feet per year) for irrigation of vineyard located on adjacent parcel(s) owned by Wappo Land Company, and that the proposed new well will allow for increased operational flexibility and distribute groundwater demands between the two wells. However, it is also indicated that utilization of the infiltration/use surplus for off-site irrigation assumes that “*the onsite wells are capable of meeting those demands*”: please clarify the ability of the proposed projects well(s) to supply water for the project and other existing uses.
 - iii. If the well located on the Lands of Prichard Hill Properties is to be utilized as a project well it will need to be including and analyzed in the Project WAA.
- d. Vineyard Development and Operations Traffic and Practice: In addition to the information provided in Application Attachment A, please provide anticipated truck and vehicle trips, equipment necessary, and number of employees necessary for, land preparation, erosion control plan installation (including importation of, soil amendments or other materials), vineyard installation, and ongoing vineyard operations This information is necessary to disclose and assess potential traffic, air quality, and climate change impacts associated with project development and operational activities.

3. Notification Information/Listing: A listing of the current owners of all the properties located within 1,000 feet of the project site/holding will be necessary to circulate the CEQA document for public review and comment. The notification information shall include the property owner’s names, their addresses, and the assessor’s parcel numbers of the property owned. Also see the enclosed *Adjoining Property Owner List Requirements* instruction sheet. You will be advised when the notification information will need to be provided.