

Exhibit B-5



June 3, 2019

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

RECEIVED

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Napa County Planning, Building
& Environmental Services

RE: Response to Comments (Biology) – P&M Mt. Veeder Vineyard Agricultural Erosion Control Plan Application File No. P19-00080-ECPA; 1300 Mt. Veeder Road, Napa, APN 034-230-029

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 1300 Mt. Veeder Road (APN 034-230-029) in Napa County, California. The request for additional information is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Review Determination – P&M Mt. Veeder Vineyard Agricultural Erosion Control Plan (ECPA) File #P19-00080-ECPA*.

The proposed project is the installation of six vineyard blocks on the property, totaling 19.01 gross acres (16.37 net acres). WRA analyzed the potential impacts to sensitive biological resources. The following addresses the County of Napa's follow-up requests for additional information.

Response to County Request

The following section directly addresses the comments from the County point-by-point (with text from the County in *italics*); the relevant page from the County's letter is included as Attachment C.

2. Supplemental Environmental Information...

a. Biological Resource Information...

i. Clarification of the extent of the Study or Study Area utilized in the Rare Plant Report (Report) and Biological Resource Assessment (Assessment).

Figure 2 within both the Assessment and Report depict the regions surveyed for the special-status plants and sensitive biological communities. These regions included the locations of the proposed vineyard blocks. No surveys for rare plants were conducted outside of these areas. However, based on County comments regarding purple needlegrass grassland received in a letter dated February 7, 2018, the entire parcel was surveyed in 2018 to map areas of purple needlegrass

grassland. The locations of observed purple needle grass grassland and the extent of the area surveyed (Study Area) is depicted in Attachment 1 within the memo drafted by WRA in March 2019.

ii. *Recommended buffers from native grasslands (i.e. Purple Needlegrass Grassland). Buffers should be large enough to maintain the viability of these grasslands and plant populations.*

Purple needlegrass is believed to be an opportunistic grass species, typically growing in areas of California with higher precipitation amounts (CNPS 2019¹). One of the biggest threats to purple needlegrass are non-native annual grasses due to competition of resources and alteration of environmental conditions at the soil surface (Hamilton et. al. 1999²). Therefore, reduction or control of annual non-native grasses is important in maintaining the viability of existing stands of purple needlegrass grasslands.

Purple needlegrass is adapted to disturbance, indicated by increased growth and recruitment following fires and grazing (when conducted appropriately), activities which reduce biomass of the non-native annual species and provide bare soil for seed germination (CNPS 2019). Disturbance (grazing, mowing) during appropriate times of the year is also known to reduce recruitment and growth of invasive annual grasses, one of the biggest threats to purple needlegrass. Therefore, appropriately timed and type of disturbance within and around purple needlegrass is sufficient to maintain the viability of populations.

Within the Project Area (all proposed vineyard blocks), the purple needlegrass grasslands are highly impacted by aggressive non-native grasses, including wild oats (*Avena* spp.), ripgut brome (*Bromus diandrus*), and soft chess (*Bromus hordeaceus*) and additional non-native species, which comprise at least 80 percent cover within the purple needlegrass grassland patches observed in the Project Areas.

The placement of a 25-foot vegetated vineyard avenue adjacent to the purple needlegrass grassland patches is a sufficient buffer to allow the grasslands to maintain viability and populations, as the vegetated vineyard avenues are regularly disturbed, which reduces the recruitment and biomass of annual non-native grasses. A no-disturbance buffer around the purple needlegrass grassland would likely be detrimental to the native grass as the absence of disturbance would allow for the continued recruitment of annual non-native grasses.

Therefore, no buffer between the purple needlegrass grassland and the vegetated vineyard avenue is necessary. However, it is recommended a cover crop blend utilizing primarily native species, such as the "Native, No Till Blend" listed in the Napa Resource Conservation District BMP report, be used within the vegetated vineyard avenue to the greatest extent practical, or, at a minimum, within the portions of the vegetated vineyard avenue adjacent to the purple needlegrass grasslands.

¹ California Native Plant Society. 2019. *Manual of California Vegetation, Online Edition*. Available at: <http://vegetation.cnps.org/>

² Hamilton, J., Holzapfel, C., Mahall, B. *Coexistence and interference between a native perennial grass and non-native annual grasses in California*. *Oecologia* 1999 121:518-526.

iii. *Mapping and acreage calculations of vegetative communities/alliances and biological communities occurring within the entire parcel. Mapping should include locations and extent of Needle Grass Grasslands or other native grasslands within the parcel.*

Attachment 1 within the memo drafted by WRA regarding the purple needlegrass grasslands depicts the extent of purple needlegrass grasslands present within the entire parcel.

iv. *A 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 special-status mosses, bryophytes, and lichens that may occur within the project area.*

Searches of the California Natural Diversity Database (CNDDDB; CDFW 2019³), California Native Plant Society Electronic Inventory (CNPS 2019b⁴), Calflora Electronic Inventory (Calflora 2019⁵), and the Napa County Baseline Data Report (NCBDR; Napa County 2005⁶) result in no documented occurrences of special-status mosses, 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 2018⁷).

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

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Korhummel', with a large, stylized loop at the end.

Rhiannon Korhummel
Plant Biologist
korhummel@wra-ca.com

³ California Department of Fish and Wildlife California Natural Diversity Database. 2019. Available at: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>

⁴ California Native Plant Society Inventory of Rare and Endangered Plants of California, Online Edition. 2019. Available at: <http://rareplants.cnps.org/>

⁵ CalFlora. 2019. 1700 Shattuck Av. Berkely, Ca. Available online at: <https://www.calflora.org/>

⁶ Napa County Dept. of Conservation, Development and Planning. 2005. Napa County Baseline Data Report.

⁷ California Dept. of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. March 20.