Exhibit B-3



October 23, 2020

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

RE: Response to Comments (Tree Removal) – Shafer Vineyards, Blodgett Vineyard Conversion Agricultural Erosion Control Plan (ECPA) File No. P020-00117-ECPA; 5096 Silverado Trail: APNs 039-051-09, -021, -023, and -033

To whom it may concern,

This letter provides a response to a request from Napa County for additional information/analysis regarding biological resources for the property located at 5096 Silverado Trail (APNs 039-051-09, -021, -023, and -033), Napa County, California. Specifically, via electronic mail sent from Mr. Barrella with the County of Napa to Annalee Sanborn of PPI Engineering, the County is requests the following:

Provide the anticipated number (or estimate) of trees being removed as part of the project. While the information in WRA's response memo provides a general qualitative analysis of the trees within each proposed clearing limit, for project description and CEQA disclosure purposes anticipated tree removal will need to be provided. This information can be provided through sample plots to extrapolate the number of trees per acre in a clearing area, aerial interpretation, or timber/tree cruise survey (or similar).

Response to County Request

Methods

Using an aerial predating the 2017 Atlas Fire was used to delineate tree canopy density. Four classifications were developed based on absolute canopy cover: (1) open (0 percent cover); (2) low (1-33) percent cover); (3) moderate (34-66) percent cover); and (4) high (67-100) percent cover). These cover classifications were then mapped in ArcGIS to determine acreage within the subject parcels as well as the proposed clearing limits (Table 1).

Table 1. Canopy cover area within the subject parcel and proposed clearing limits

Density of Canopy Cover	Area Subject Parcel (acres/sq. ft.)	Area in Proposed Clearing Limits (acres/sq. ft.)	
Open	88.04 / 3,835,022	0.46 / 20,038	
Low	31.92 / 1,390,435	8.39 / 365,468	
Moderate	33.18 / 1,445,321	5.15 / 224,334	
High	63.74 / 2,776,514	14.34 / 624,650	

Five plots were then located within each of the canopy cover classes of low, moderate, and high (open was excluded due to being entirely devoid of trees). The sample plots were 100 feet in diameter for a total of 7,850 square feet. All trees and shrubs greater than six inches in diameter at breast height (DBH) within the plot where then counted. The number of trees were averaged across each canopy cover type, and then extrapolated across both the proposed clearing limits and subject parcels.

Results

The average number of trees for each of the canopy cover types and extrapolating those averages across both the proposed clearing limits and subject parcels are summarized in Table 2. An estimated total of 7,913 trees are situated across the three subject parcels, with an estimated 1,708 trees to be removed as part of the project, resulting in an estimated 6,205 trees, or 78 percent, to remain standing.

Table 2. Trees to be removed and to remain

Canopy Cover Type	Average no. trees per plot	No. of trees per clearing limits	No. of trees per subject parcel	Percent retained
Low	5	233	886	44%
Moderate	8	234	1510	82%
High	16	1241	5518	71%

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

Sincerely,

Aaron Arthur

Associate Plant Biologist

Certified California Consulting Botanist #0016

arthur@wra-ca.com