

## Exhibit B-2



August 14, 2020

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

**RE: Response to Comments (Biology) – 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. The request for additional information is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Review Determination – Shafer Vineyards, Blodgett Vineyard Agricultural Erosion Control Plan (ECPA) File #P19-00117-ECPA*. The following addresses the County of Napa's follow-up requests for additional information.

### **Response to County Request – Letter**

The following section directly addresses the comments from the County point-by-point (with text from the County in *italics*).

### **2. Supplemental Environmental Information: . . .**

#### **a. Biological Resource Information: . . .**

*i. An expanded discussion and assessment associated with potential direct and cumulative impacts associated with the loss of the special-status plant species and their associated habitat occurring within the holding and project area. The presence of concentrations of special-status plant species identified, in addition to other native plant species located throughout the property, suggests that potential special-status plants species habitat may occur in other areas of the holding even though special-status plants are not present. In other words, the lack of presences would not automatically dismiss an area from being potential special-status species habitat. Details that describe the habitat characteristics that provide suitable special-status plant species habitat and how it compares to potential habitat within the project area will need to be provided. Additionally, the locations of potential special-status plants species habitat will need to be shown on Figure A-5 or in a separate figure.*

Three special-status plants were documented in the property during the 2018 surveys: green monardella (*Monardella viridis*), Greene's narrow-leaved daisy (*Erigeron greenei*), and nodding harmonia (*Harmonia nutans*). Green monardella and nodding harmonia are California Rare Plant Rank (CRPR) 4, while Greene's narrow-leaved daisy is CRPR 1B. All three species are prevalent throughout the mountainous areas of Napa County, with Greene's narrow-leaved daisy being the least frequent. Table 1 summarizes and Figure A-6 illustrates the areas that are currently occupied and potential special-status plant habitat within the Study Area.

Table 1. Documented (Occupied) and Potential Special-status Habitat Area

Species	Occupied Habitat (acre)	Potential Habitat (acre)	Potential Removed Habitat (acre)	Potential Remnant Habitat (acre)	Potential Remnant Habitat (percent)
green monardella	0.004 acre	48.87 acres	15.62 acres	33.25 acres	68%
Greene's narrow-leaved daisy	0.06 acre	10.81 acres	4.12 acres	6.69 acres	62%
nodding harmonia	4.96 acres	39.88 acres	12.02 acres	27.86 acres	70%

\*See Table 4 below for removed occupied habitat

Areas of recently (2017 Atlas Fire) dense brush south-facing slopes underlain by rocky substrate are considered potential habitat for green monardella. Open (herbaceous) and relatively open (intermittent trees) areas with large, exposed rock are considered potential habitat for Greene's narrow-leaved daisy. Finally, those areas of grassland and very open woodland are considered potential habitat for nodding harmonia. The majority of the mapped potential habitat will be not impacted by the proposed project; thereby, leaving host sites for mitigation seeding/planting and refuge for future generations of these species.

ii. Provide an expanded discussion and assessment of potential Foothill yellow-legged frog (FYLF) habitat (including nesting, refugia, and dispersal habitat) that is located within the project area and holding. Potential FYLF habitat areas will also need to be show on Figure A-5 or in a separate figure. Additionally, provide recommended buffers from identified FYLF habitat.

The Study Area streams provide foraging habitat for FYLF when these streams contain a wetted channel. The lower portions of the intermittent streams in the northern portion and southern portion of the Study Area have the potential to support FYLF later in the season, including possible breeding during wetter years. One FYLF was observed in a large pool in the lower portion of the intermittent stream in the northern Study Area in April 2018. All of the Study Area drainages were completely dry, with the exception of the large pool noted above, during subsequent visits in July 2018 and June 2020. FYLF are unlikely to travel overland in the Study Area; the streams provide dispersal corridors. During seasonal draw down of these streams, FYLF would likely travel downstream to seek out perennial waters (pools, flowing) in connected stream beds.

Figure A-7 attached denotes the various types of aquatic habitat for FYLF within the Study Area. The project has been amended to remove the proposed Vineyard Block 1 and to reduce proposed Vineyard Block 2; this amendment eliminated the proposed stream crossing, further reducing the potential intersection with FYLF. The required stream setbacks should provide a sufficient buffer to protect FYLF; these frogs rarely stray from

the wetted portions of channels and streambanks. The project will be conducted during the season when it is likely that the streams are dry and FYLF are absent. As noted in the BRRS, a biologist should investigate the site prior to construction to determine if the streams are wetted. If the streams are wetted, then a survey following those outlined in the BRRS should be conducted, and recommendations to avoid impacts determined.

*iii. Provide a targeted bat habitat assessment that identifies potential bat habitat trees (i.e., those trees contain features such as limbs and trunks with cavities, crevices, and deep bark figures that can support bat roosting) located within the project and the extent of potential bat habitat trees within the holding.*

#### Background

Bats are typically considered during environmental review by Napa County and also protected by California Fish and Game Code, i.e., Sections 86, 2000, 2014, 3007, and 4150, along with Title 14 of California Code of Regulations.

#### Methods

A daytime roost survey assessed all trees and substrates within the proposed vineyard development to determine if bat roosting habitat was present. This survey was completed by walking the entire Project Area, and surveying each tree scheduled for removal or trimming. During the survey the biologist noted features or conditions that may be favorable or unfavorable for bat use such as thermal conditions, frequency of disturbance, and evidence of potential predators. All trees were also investigated for fissures, cracks, or hollows that could provide roosting substrate for bats.

#### Results

No bat roosting habitat was observed within the Project Area, nor were any bats. The Project Area is primarily comprised of grassland and burned out oak trees; none of the trees scheduled for removal contain features that might support bat roosting. Specifically, the subject trees lacked suitable cracks, fissures, and hollows, and none featured large sections of exfoliating bark. Additionally, many of the trees in the Project Area were relatively small in diameter, and therefore are not likely to support surface roosting bats as the trees do not contain the mass required for stable surface roosting.

No suitable bat roosting substrates were observed within the Project Area, nor was any indication of bat roosting. As such, in accordance with the condition, no additional avoidance measures are recommended.

*iv. Identify the anticipated number of trees, including species and diameter at breast height (DBH), of trees being removed as part of the project (also see Item #2.a.ii)*

Introduction & Summary: It is WRA's understanding that discussions between the County and PPI Engineering resulted in the County accepting a qualitative assessment of native trees within the subject property in lieu of a full arborist scope. Such an assessment was performed on June 11 and June 23, 2020 within the proposed vineyard blocks; the details of such are as follows.

**Methods:** Two WRA botanists familiar with the site, traversed the entirety of all eight proposed vineyard blocks and peripheral areas. In each block, native trees were classified by their canopy, height, diameter at breast height (DBH), estimated age cohort, and structural complexity as a proxy for wildlife habitat value. Additionally, notes were taken regarding the effects of the 2017 Atlas Fire on individual trees. A full arborist scope (i.e., measuring and counting of each tree) was not conducted as part of this study.

**Results & Discussion:** The eight blocks are composed of a combination of non-native grassland, chamise chaparral, blue oak woodlands, and coast live oak woodlands. The dominant tree in all eight blocks is coast live oak (*Quercus agrifolia*), with the exception of the of blue oak woodlands, which is dominated by blue oak (*Quercus douglasii*). Table 2 summarizes the classifications by vineyard block.

Table 2. Native Tree Classification within the Project Area (Proposed Clearing Limits)

Vineyard Block #	Age Class (nominal)	DBH (range)	Height (range)	Crown (range)	Dominant Trees, Structure, and Fire Effects
2A & 2B	immature – mature	16" – 24"	15' – 25'	15' – 25'	coast live oak, blue oak; mostly single-stem; moderate fire damage; most crown sprouting, with little to no top-kill
3	immature – mature	16" – 24"	20' – 35'	20' – 30'	Pacific madrone, blue oak, coast live oak; many multi-stem; moderate to severe fire damage; most sprouting from stump, with some top-kill
4	sapling – mature	6" – 10" 16 – 24"	5' – 10' 20' – 35'	5' – 10' 20' – 35'	coast live oak, Pacific madrone, California bay; moderate to severe fire damage; younger trees with top-kill and stumping sprout
5	immature – mature	10" – 16" 12 – 24"	15' – 25' 20' – 35'	10' – 20' 20' – 35'	coast live oak; moderate to severe fire damage; mostly single-stem; older trees crown sprouting, younger trees stump sprouting
6	immature	6" – 12"	10' – 15'	10' – 15'	coast live oak; moderate to severe fire damage; mostly multi-stem; mix of stump and crown sprouting
7	immature	6" – 12"	10' – 15'	10' – 15'	coast live oak; moderate to severe fire damage; mostly multi-stem; mix of stump and crown sprouting
8A & 8B	immature – mature	8" – 12" 16" – 24"	10' – 15' 20' – 35'	10' – 15' 15' – 25'	coast live oak; moderate to severe fire damage; older trees mostly single-stem and crown sprouting; younger trees are stump sprouting
9	mature	16" – 28"	20' – 35'	15' – 30'	coast live oak; moderate fire damage; all crown sprouting; single-stem

\*the upper portion of the tree(s) or crowns are dead; however, rootstock may still be alive with photosynthesis occurring through stump sprouted foliage

Most of the trees do not provide structures sufficient for nesting birds (e.g., holes, broken branches, collected duff, dense foliage), and no structures for roosting bats (e.g., cracks, holes, peeling bark). Crown foliage has been severely diminished from the 2017 Atlas Fire, thereby substantially reducing nesting habitat. No active nests were detected; however, this study is not a protocol-level nesting bird survey so such negative results are suggestive not declarative. The areas outside of the proposed vineyard blocks contain the same suite of species with the same classification of size and structure. These remnant trees should provide continued benefits of oak trees and general native woodland cover within the property.

*v. Provide tables that include: 1) a listing and amount of the land cover types (i.e., vegetation types or biotic communities) within the holding, the amount of each cover type being removed, and remaining amounts; and 2) a listing and amount of the special-status plant species and habitat within the holding, the amount of each plant and habitat to be removed, and the remaining amounts (also see Item #2.a.i and #2.a.ii).*

The following tables summarize the existing and proposed removal/remnant area of land cover types and special-status plants. Figure A-8 includes land cover types with an expanded Study Area to include the entirety of the parcels (northern parcel (APN: 039-051-033) was not included in its entirety in the BRRS Report.

Table 3. Existing and Proposed Remnant/Removed Land Cover Types

Land Cover Type	Existing (acres)	Proposed Removed (acres)	Proposed Remnant (acres)	Proposed Remnant (percent)
Developed	91.07 acres	0.49 acres	90.58 acres	99%
Non-native Grassland	15.45 acres	2.97 acres	12.48 acres	81%
Chamise Chaparral	7.03 acres	4.30 acres	2.73 acres	39%
Blue Oak Woodland	18.6 acres	2.97 acres	15.63 acres	84%
Coast Live Oak Woodland	83.99 acres	17.61 acres	66.38 acres	79%
Seasonal Wetland	0.74 acres	0.0 acres	0.74 acres	100%

Table 4. Existing and Proposed Remnant/Removed Special-status Plants

Land Cover Type	Existing (acres)	Proposed Removed (acres)	Proposed Remnant (acres)	Proposed Remnant (percent)
Green monardella	0.004 acre	0.001 acre	0.003 acre	75%
Greene's narrow-leaved daisy	0.06 acre	0.0 acre	0.06 acre	100%
Nodding harmonia	4.96 acres	2.32 acres	2.64 acres	53%

*vi. An identification and discussion of any special-status mosses, bryophytes, and lichens 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.*

Searches of the California Natural Diversity Database (CNDDDB; CDFW 2020), California Native Plant Society Electronic Inventory (CNPS 2020), Calflora Electronic Inventory (Calflora 2020), 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 known occurrences of special-status in the general vicinity (CDFW 2020).

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Arthur', with a stylized, flowing script.

Aaron Arthur  
Associate Plant Biologist  
Certified California Consulting Botanist #0016  
arthur@wra-ca.com

**ENCLOSURES:** Attachment A – Figures

## **CITATIONS**

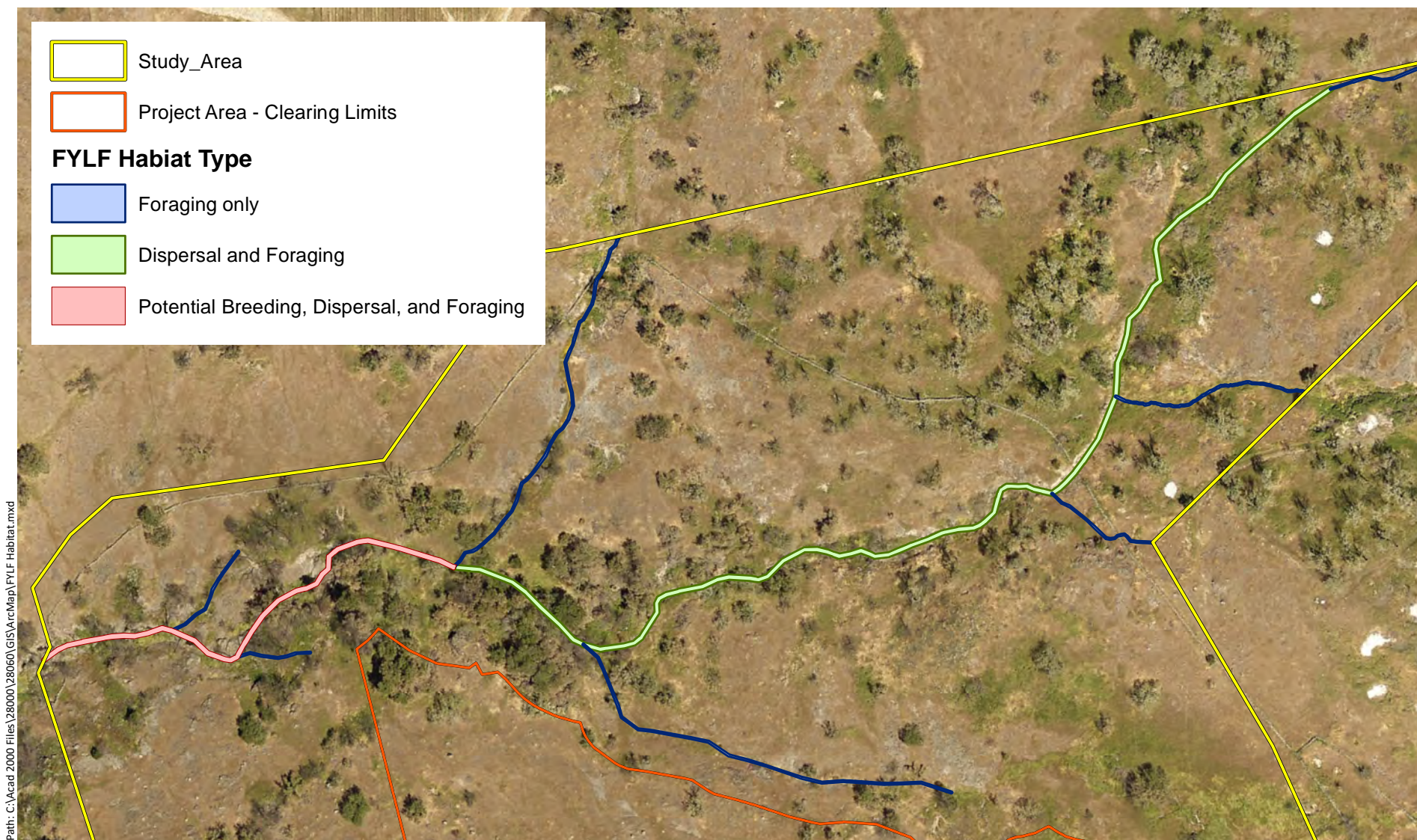
Calflora. 2020. Website: Information on wild California plants for conservation, education, and appreciation. Available at: <http://www.calflora.org/>. Accessed: July 2020.

California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Database (CNDDB), Wildlife and Habitat Data Analysis Branch. Sacramento, CA. Accessed: July 2020.

California Native Plant Society (CNPS). 2020. Online Inventory of Rare, Threatened, and Endangered Plants of California. Available at: <http://www.rareplants.cnps.org/>. Accessed: July 2020.

Napa County. 2005. Napa County Baseline Data Report. Available at: <http://www.co.napa.us/gov/>

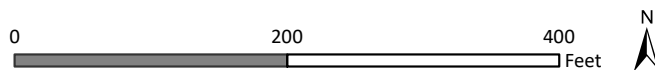




Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: aarthur, 8/14/2020

**Figure A-6a. FYLF Habitat (northern Study Area)**

Shafer Mesa  
Napa County, CA

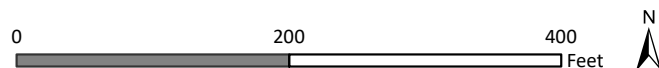




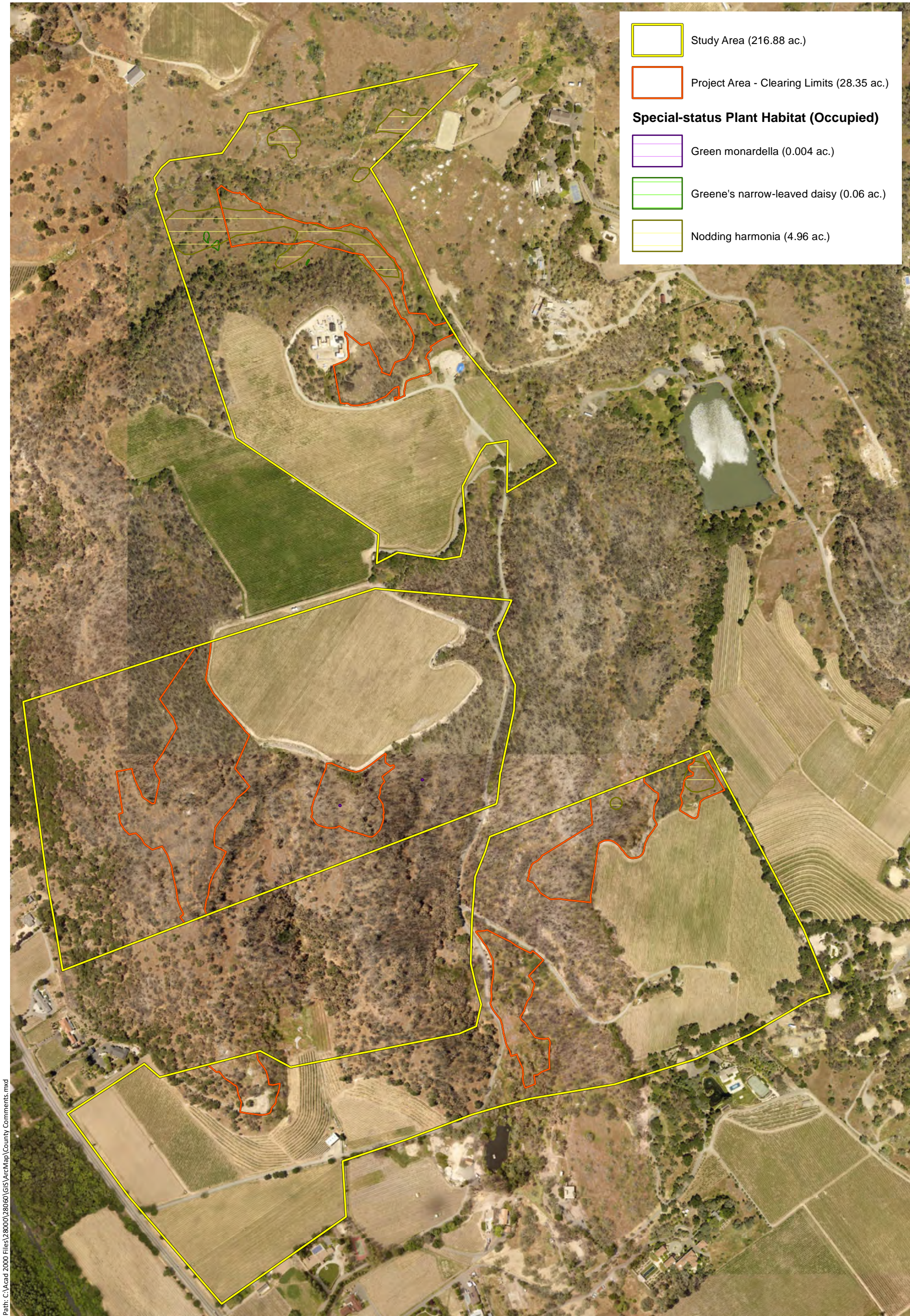


**Figure A-6b. FYLF Habitat (southern Study Area)**

Shafer Mesa  
Napa County, CA







Path: C:\Acad 2000 Files\28000\28060\GIS\ArcMap\County Comments.mxd

Sources: 2016 DigitalGlobe Aerial, WRA | Prepared By: aarthur, 8/14/2020

Figure A-7a. Special-status Plant Habitat (Occupied)

Shafer Mesa  
Napa County, CA





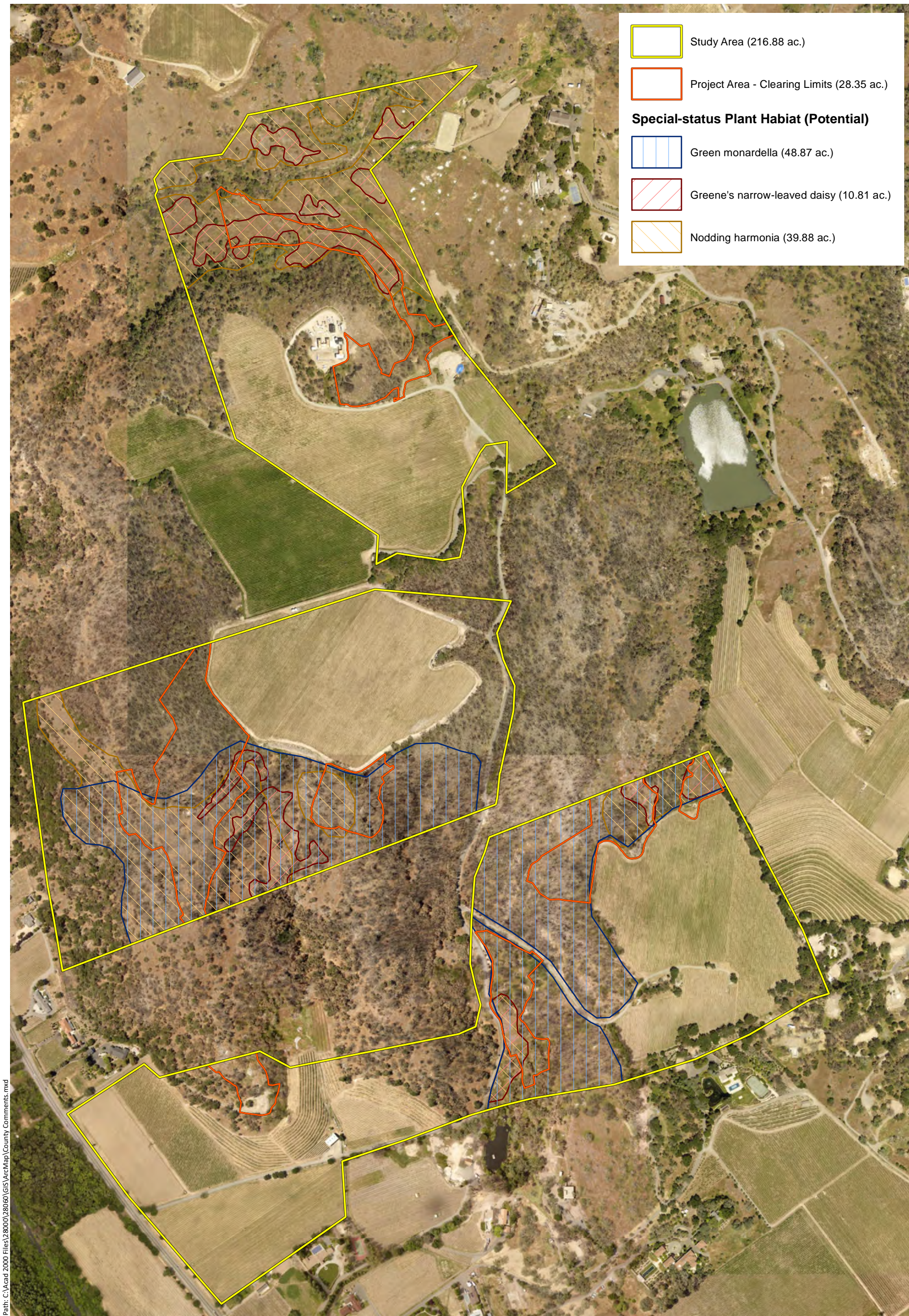
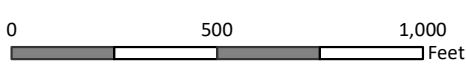


Figure A-7b. Special-status Plant Habitat (Potential)

Shafer Mesa  
Napa County, CA





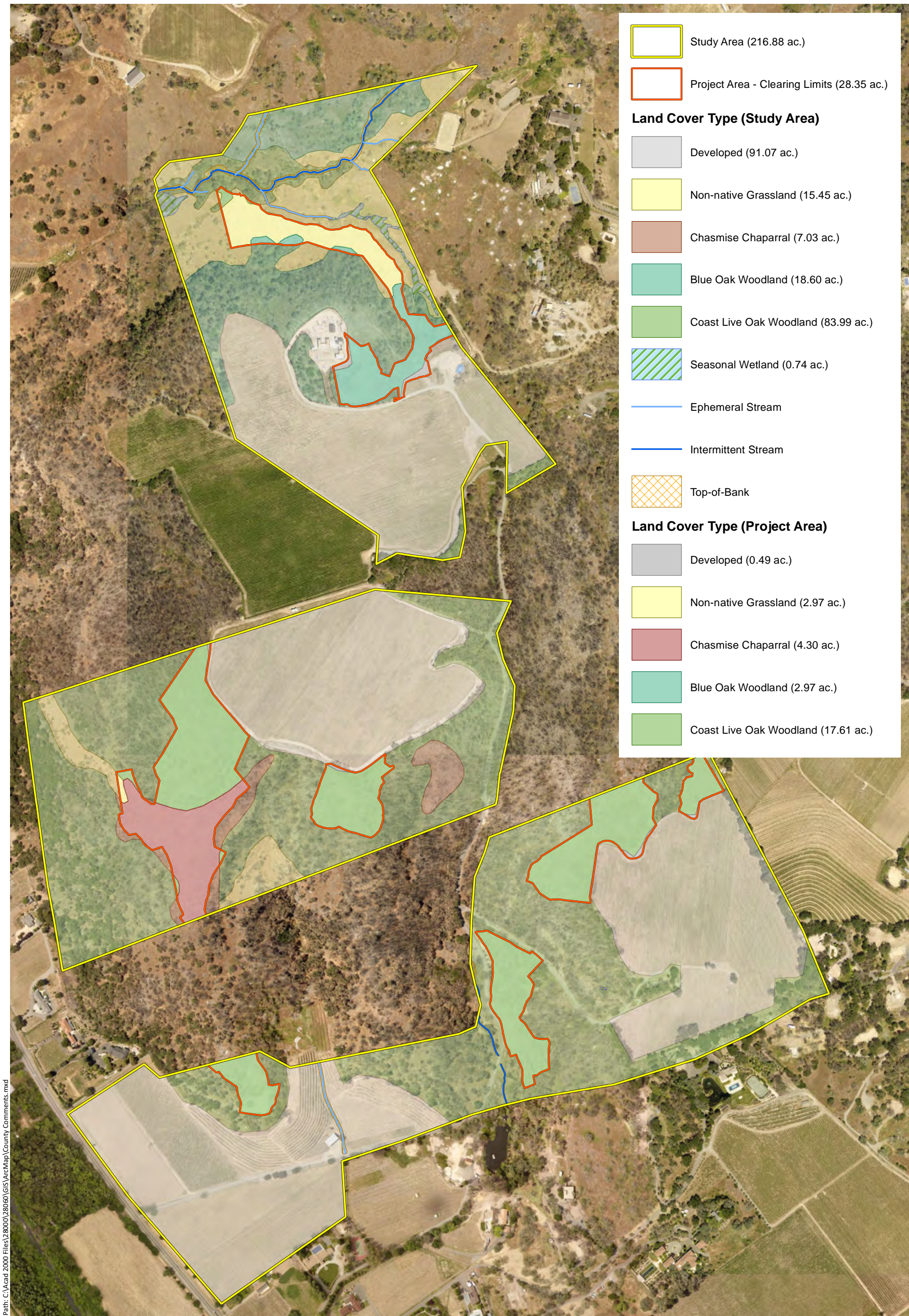


Figure A-8. Updated Land Cover

Shafer Mesa  
Napa County, CA

