



February 17, 2021

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

Re: Pritchard Hill Properties, Napa County ECP – Response to Napa County comments on biological resources (File #P20-00205-ECPA)

Ms. Arifian:

This letter provides a response to a request from Napa County (County) for additional information/analysis regarding biological resources for the property located at 90, 92 & 95 Long Ranch Road (APNs 030-220-034, 032-560-023) 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 – Pritchard Hill Properties LLC Vineyard Development Agricultural Erosion Control Plan (ECPA) File #P20-00205-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 June 2020. This letter is effectively an addendum to WRA's June 2020 report.

The proposed project is the installation of new vineyard blocks on the property. Note that some project elements have been altered relative to that shown in WRA's June 2020 report, e.g., final configurations of some vineyard blocks; many of these alterations were made specifically to reduce impacts to sensitive biological resources. Additionally, the installation of a second new water tank and new water lines are included; it is WRA's understanding that the latter will be installed within developed or otherwise disturbed areas, with no impacts to biological resources. The revised proposed project overlain with the Study Area are shown in Figures A-1 (land cover) and A-2 (special-status plants) (Attachment A), and updated impact data are shown below as warranted. The alterations are generally minor and do not affect the conclusions in the original report.

A qualified WRA plant biologist (Aaron Arthur; co-author) performed a site visit on November 11, 2020 in support of addressing some elements of the County's request.

Response to County Request

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...

i. Please provide an addendum or update to the [BRRS report] that includes a re-assessment of the impacts to the chamise chaparral acreage and to the special-status species due to the activities associated with the installation of the “New Well.”

Clearing of chamise chaparral to accommodate the well installation occurred subsequent to WRA’s site visits and biological resource mapping in 2017, and under a previous owner (unrelated to the current proposed project). Impacts to land cover types and special-status plants within the 0.35-acre subject area (Well Clearing) are respectively shown in Figures A-3 and A-4, and summarized in Table 1.¹ During the November 2020 site visit, the Well Clearing was investigated for evidence of natural regeneration of chamise chaparral. Chaparral regeneration was documented within 0.19 acre of the cleared area, and plants observed there included three of the four focal special-status species (Figure A-4). Although some regeneration was observed in the remaining 0.16 acre as well, this area exhibits substrate alterations that render it unlikely to support full regeneration under existing conditions. The current property owners intend to allow the regenerating area to continue to (passively) revegetate and mature. With the exception of the new water tank (impacting 0.03 acre of the regenerating area), these land cover impacts are treated herein as temporary in nature.

Table 1. Summary of Well Clearing Impacts

Resource	Acreage impacted	% of total (site-wide)	Notes
chamise chaparral (land cover type)	0.35	1.3	0.19 acre regenerating
green monardella <i>Monardella viridis</i>	0.08	0.7	regeneration observed
holly-leaved ceanothus <i>Ceanothus purpureus</i>	0.35	2.8	regeneration observed
narrow-anthered brodiaea <i>Brodiaea leptandra</i>	0.18	16.5	-
Sharsmith’s western flax <i>Hesperolinon sharsmithiae</i>	0.18	10.5	regeneration observed

ii. In the discussion for Interior Live Oak Woodland Land [sic] under Section 5.1.1...the discussion alternates between interior live oak and coast live oak. Please clarify and revise as necessary for accuracy and clarity.

¹ The area and extent of the cleared area as presented herein was reviewed and approved by you (Pamela Arifian) via email on Nov. 30, 2020.

The text describing the interior live oak woodland land cover type contained two typographical errors. A revised version of the account is below, with corrected words in **bold**; note that the second paragraph is not included (as no revisions were needed):

Interior Live Oak Woodland (*Quercus wislizenii* Forest Alliance). CDFW Rank: G4 S4: Interior live oak woodlands (including forests) typically occur on upland slopes, valley bottoms, and terraces on shallow soils which are moderately to excessively drained (CNPS 2020b). The Study Area contains 49.2 acres of **interior** live oak forest, with 12.2 acres situated in the Project Area (approximately 25 percent of the total community type in the Study Area). Interior Live Oak Alliance NCLC type is synonymous with Interior Live Oak Woodland CDFW Alliance (Thorne et.al. 2004).

...

These woodlands/forests provide habitat for numerous common native plants and wildlife, as well as have the potential to support special-status species associated with woodlands. The CDFW does not consider **interior** live oak woodland a sensitive natural community. Conversely, these woodlands are considered sensitive Napa County under the General Plan Conservation Element Policy CON-24 (oak woodland retention).

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

Searches of the California Natural Diversity Database (CNDDB; CDFW 2021), California Native Plant Society Electronic Inventory (CNPS 2021), Calflora Electronic Inventory (Calflora 2021), 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 or cismontane woodland (e.g., oak woodland/forest); most have been documented from coniferous forest types. While the Study Area contains a stand of coniferous forest, it is not being impacted by the proposed project. And as noted above, none have been documented from Napa County or the immediate environs with similar chaparral and woodland types.

iv. Please identify locations of concentration of green monardella on Figure 4 and clarify the amount to be removed versus retained.

WRA's botanical field surveys occurred in 2017. At this time, it was unclear that detailed mapping of green monardella (*Monardella viridis*, California Rare Plant Rank 4) would be required for purposes of CEQA review. In WRA's experience, Rank 4 species (e.g., green monardella) are typically not considered in detail under CEQA, and the species is not listed as a special-status plant by Napa County (2005). As such, the presence of the species and some population locations were noted, but mapping was not completed across the site as it was for other special-status plants. When it became clear that the County considered green monardella and its inclusion in the BRRS report was necessary, the assumption that its on-site distribution overlapped broadly with that of holly-leaved ceanothus (*Ceanothus purpureus*) was made, based on observations by WRA both within the Study Area and at other Napa County sites with similar soil types.

To refine mapping for green monardella, on-site areas with suitable (chaparral) habitat for this species were investigated directly during the November 2020 site visit. Although nearly all individuals observed were senesced, the species remained readily identifiable in the field, and was mapped to a level of detail commensurate with other relevant special-status plants. Locations of green monardella populations are shown in Figure A-2. These include one relatively large population area north of proposed Block 17 that was not shown in the original BRRS report, with a total of 11.9 mapped acres for this species site-wide. The density of individual green monardella plants was roughly uniform across the various mapped populations. An updated impacts summary for this species is included below.

Revised Impacts Summary

A summary of revised impacts to land cover types and special-status plants within the Study Area are respectively provided in Tables 2 and 3 below. For land cover, note that the regenerating portion of the Well Clearing area is included in retention (as non-impacted). For special-status plants, regeneration within the Well Clearing area is not included; as such, retention values will likely be larger than those presented here once full generation is expressed.

Table 2. Impacts to Land Covers Within the Study Area

Land cover*	Acreage		Percent	
	Total	Impact.	Impact.	Retain.
coyote brush scrub	1.2	0.5	42	58
chamise chaparral**	27.5	7.9	29	71
coast live oak woodland	0.8	0.8	100	0
gray pine woodland	1.8	1.4	78	22
interior live oak forest	49.2	11.8	24	76
Douglas fir forest	2.0	0.0	0	100
oak woodland total (coast plus interior live)	50.0	12.6	25	75

* "Developed" not shown.

** Non-regenerating portion of the Well Clearing area (0.2 acre) is included in impact acreage, and the regenerating portion (0.2 acre) is included in retention.

Table 3. Impacts to Special-status Plants Within the Study Area

Species	Acreage			Percent	
	Mapped total	WC impacts*	New impacts	Total impact.	Retain.**
green monardella	11.9	0.1	1.9	17	83
holly-leaved ceanothus	12.5	0.4	3.1	28	72
narrow-anthered brodiaea	1.1	0.2	0.01	19	81
Sharsmith's western flax	1.7	0.2	0.2	24	76

* WC = Well Clearing.

** Regenerating portion of the WC area is not included in retention; ultimate retention values are thus anticipated to be larger than those presented here.

As shown in Table 2, the proposed project will retain 75 percent of on-site oak woodland/forest (combining coast live and interior live oak woodland/forest). This satisfies the 3:1 retention ratio stipulated in Policy CON-24.

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

Sincerely,



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Aaron Arthur
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Certified California Consulting Botanist #0016
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Enclosures: Attachment A – Figures
Attachment B – Excerpt pages from County letter

REFERENCES

Calflora. 2021. Website: Information on wild California plants for conservation, education, and appreciation. Available at: <http://www.calflora.org/>. Accessed: January.

California Department of Fish and Wildlife (CDFW). 2021. California Natural Diversity Database (CNDDDB), Wildlife and Habitat Data Analysis Branch. Sacramento, CA. Accessed: January.

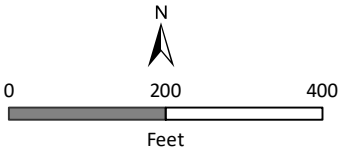
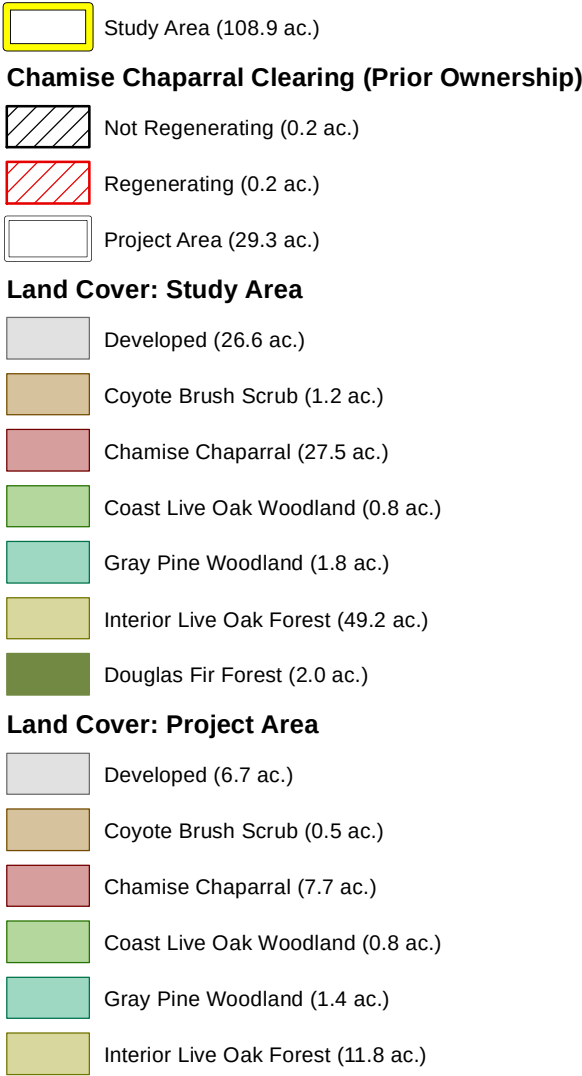
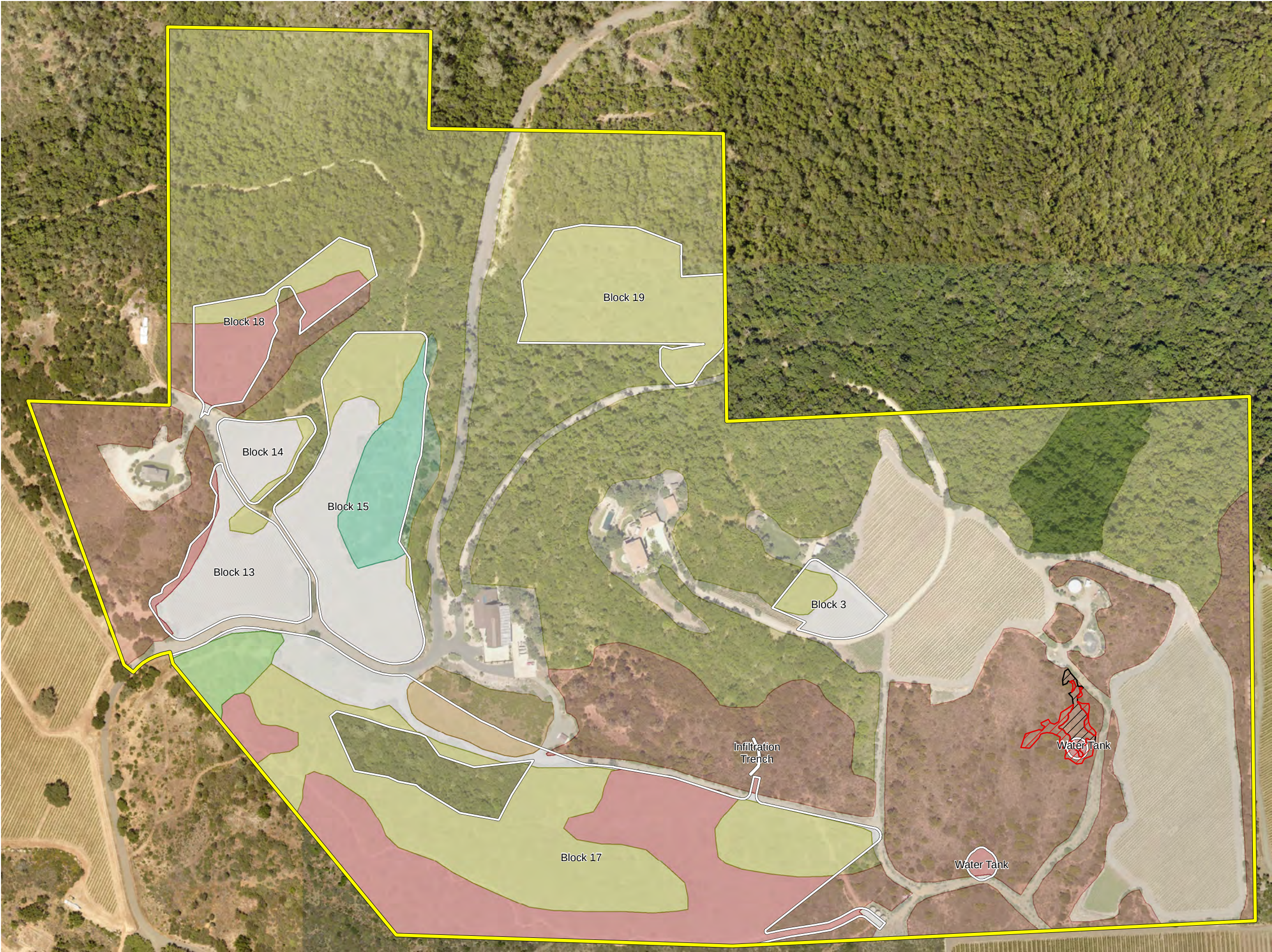
(CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities. California Natural Resources Agency, California Department of Fish and Game. March.

California Native Plant Society (CNPS). 2021. Online Inventory of Rare, Threatened, and Endangered Plants of California. Available at: <http://www.rareplants.cnps.org/>. Accessed: January.

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

Figure A-1.
Land Cover

90, 92 & 95 Long Ranch Road
Napa County, CA



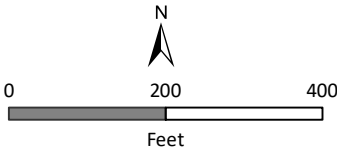
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Figure A-2.
Special-status Plants

90, 92 & 95 Long Ranch Road
Napa County, CA



-  Study Area (108.9 ac.)
- Chamise Chaparral Clearing (Prior Ownership)**
-  Not Regenerating (0.2 ac.)
-  Regenerating (0.2 ac.)
-  Project Area (29.3 ac.)
- Special-status Plants: Study Area**
-  Green Mondardella (11.9 ac.)
-  Holly-leaf Ceanothus (12.5 ac.)
-  Narrow-anthered Brodiaea (1.1 ac.)
-  Sharsmith's Western Flax (1.7 ac.)
- Special-status Plants: Project Area**
-  Green Mondardella (1.9 ac.)
-  Holly-leaf Ceanothus (3.1 ac.)
-  Narrow-anthered Brodiaea (0.01 ac.)
-  Sharsmith's Western Flax (0.2 ac.)



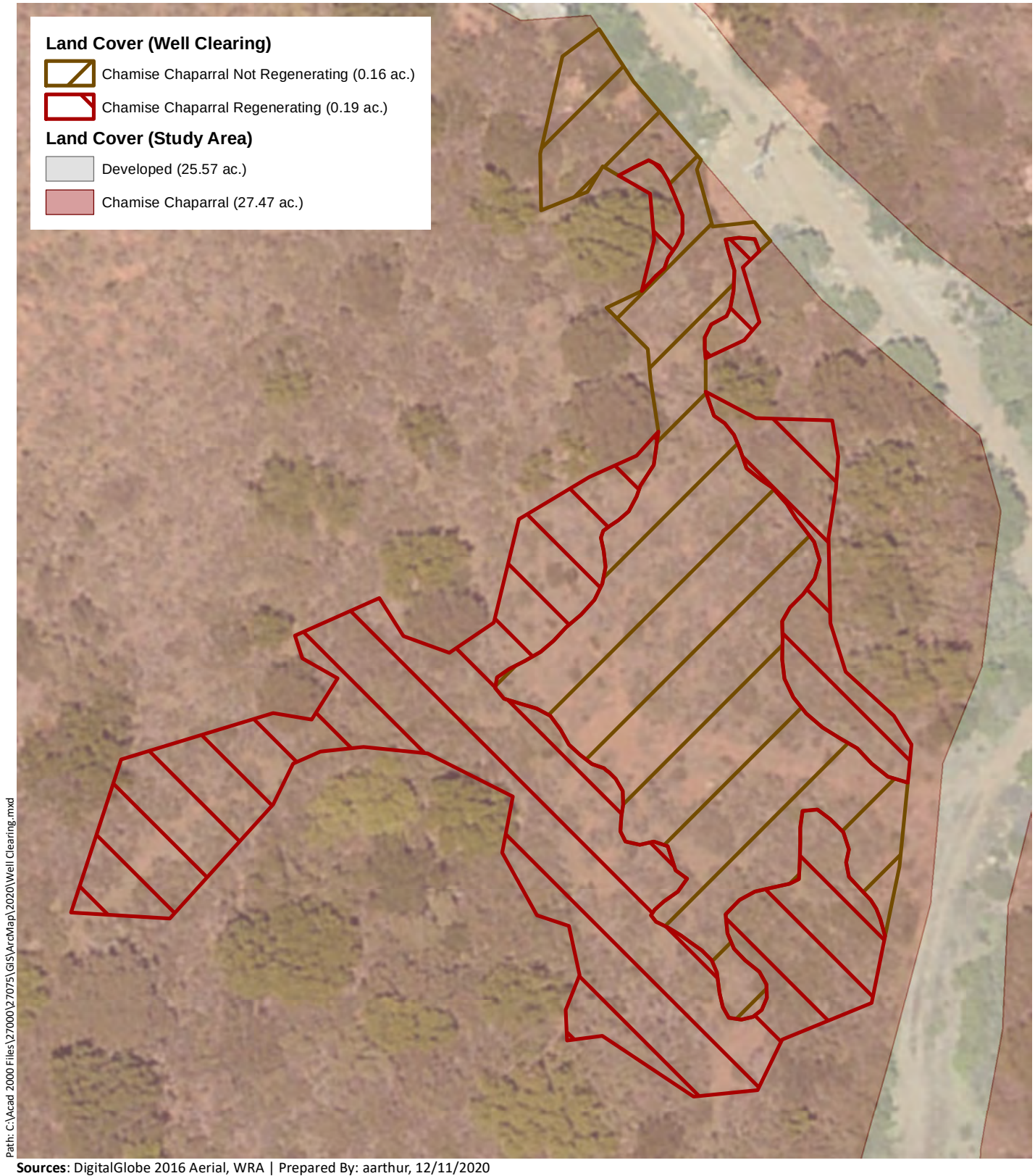


Figure A-3. Well Clearing Area & Land Cover

90, 92 & 95 Long Ranch Road
Napa County, CA

0 25 50
Feet



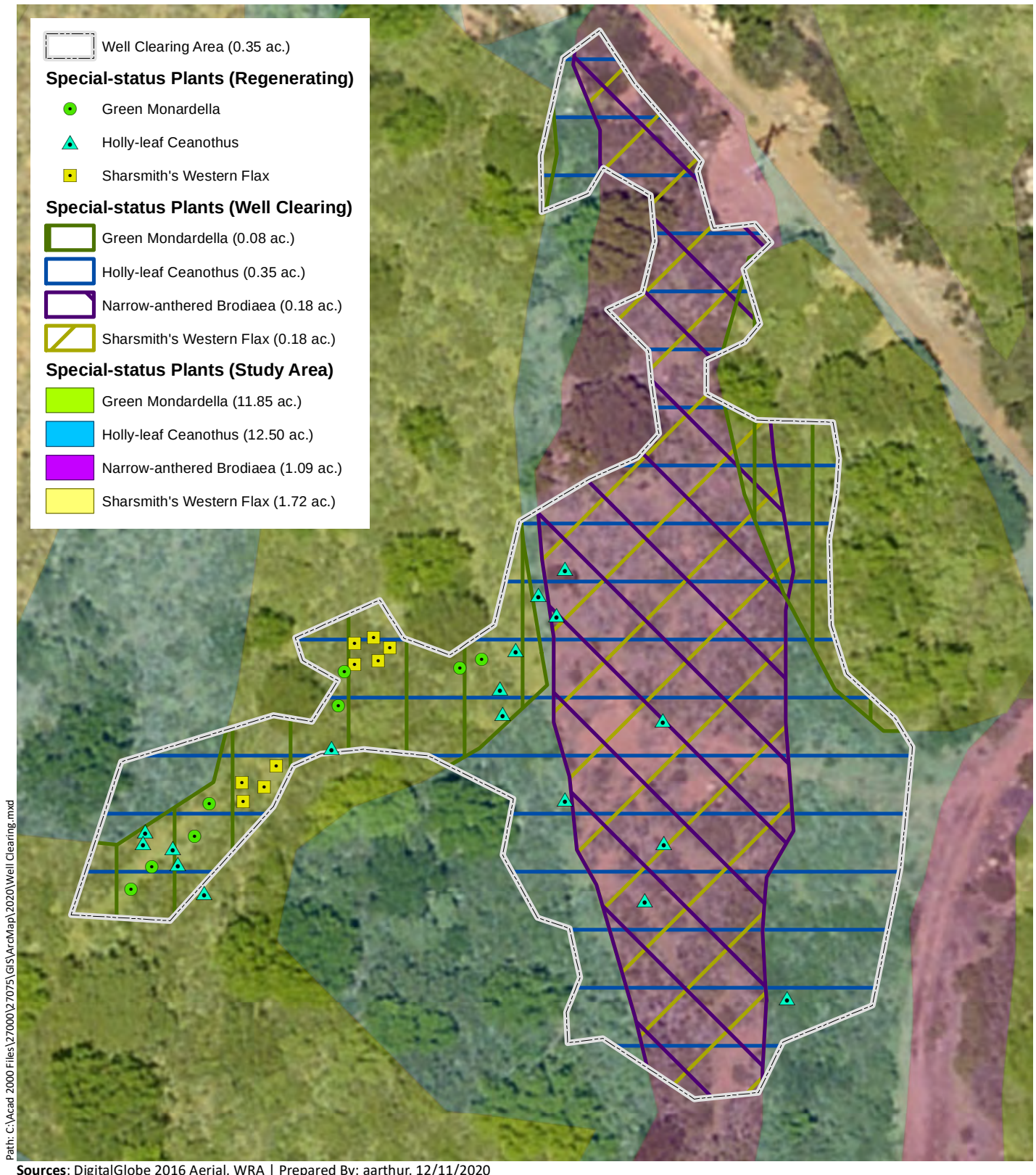


Figure A-4. Well Clearing Area & Special-status Plants

90, 92 & 95 Long Ranch Road
Napa County, CA

0 25 50
Feet



EXHIBIT A**APPLICATION COMPLETENESS DETERMINATION – INFORMATION REQUEST****Pritchard Hill Properties LLC Vineyard Development #P20-00205-ECPA: APNs 030-220-034 & 032-560-023**

1. Agricultural Erosion Control Plan Application Completeness Items: This information is necessary to clearly define and describe the full extent of the proposed project; adequately disclose, assess, and minimize potential impacts of the project pursuant to CEQA; assess the project's compliance with applicable General Plan Goals and Policies and the County Conservation Regulations; and complete the ECPA application.

- a. Geotechnical Report: Pursuant to NCC Section 18.108.027(f), please provide a geotechnical report a prepared by a qualified professional for the proposed project: it appears that RGH has prepared this report however it may not have been included in the submittal package.
- b. Please confirm whether or not the apparent earth-disturbing activity observed on Google Earth (aerial dated 9/2018) west of existing Blocks 8 and 9 is included in the total developed area acreage, as well as the vegetation removal/retention analysis (refer to #2a, below). Please confirm whether this activity is associated with the installation of the "New Well" as identified in the WAA.
- c. ECPA plans and/or narrative: Please provide revised plans and/or narrative that include, show or clarifying the information below:
 - i. The Block 17 polygon as shown on the Tree Survey Map figure at the end of Section 8 of the Application Submittal Package does not match the configuration of that Block in the ECP plans. Please revise the Map and tree removal counts accordingly, and update the tree count in the ECP plans, Attachment A and narrative. Additionally, the GIS shape files provided for the proposed project do not match Block 17 as shown in the ECP plans; please send the revised shape file in your resubmittal. Please also revise the Tree Survey Map to include the northern areas of Block 18 and Block 19 that are excluded from the Map.
 - ii. Regarding the new access road to Block 19, it appears that it may be located on slopes in excess of 30% as shown on County GIS Topographic Maps. Please provide slope calculations pursuant to NCC Section 18.108.060(C)(2) (Slope Determination Methodology: Road/Access Development). Please be advised that any new access roads that have an average slope in excess of 30% will require a Conservation Regulation Use Permit Exception application pursuant to NCC Section 18.108.040 for continued processing. Use Permit Exception applications are decided by the Planning Commission at a notice public hearing for the entirety of the project. Additionally, please confirm whether the proposed access road to Block 19 is included in the total area (0.7-acre) with slopes of 30% or more.
 - iii. The site plan (Sheet C1) shows the Easement Well and the Fitts Well located west of Block 9. Please identify on the site plan the location of the "New Well" as identified in the WAA, as well as any associated infrastructure, including proposed primary irrigation lines and other improvements necessary to operate the proposed new and expanded vineyard blocks. The area of earth-disturbance necessary to install new irrigation lines and associated infrastructure located outside of proposed vineyard development areas will need to be included and accounted for in the project's narrative, plans, and project's soil loss and hydrologic modeling.
 - iv. Provide more details about the existing wildlife exclusion fence, including installation date, heights, and configuration (i.e. wire mesh, wire strand, etc.).
 - v. Please clarify whether the proposed water tank is included as part of this project. The note on Sheet C1 indicates it is being processed under a separate permit; however, in reviewing the pending building permit for the tank (BC20-00905), it appears to be in a different location. Please be advised that the tank may be subject to the Viewshed Protection Program (NCC 18.106). Please provide

additional details regarding the proposed water tank including capacity, height, width and exterior treatment.

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:**
 - i. It appears that the Biological Resource Assessment prepared by WRA (June 2020) relied on site visits that occurred in 2017, prior to the installation of the "New Well" in 2018 west of existing Blocks 8 and 9 in APN 032-560-023. Please provide an addendum or update to the Assessment that includes a re-assessment of the impacts to the chamise chaparral acreage and to special-status species due to activities associated with the installation of the "New Well."
 - ii. In the discussion for Interior Live Oak Woodland Land under Section 5.1.1, Terrestrial Land Cover Types, the discussion alternates between interior live oak and coast live oak. Please clarify and revise as necessary for accuracy and clarity.
 - iii. Please include 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 (CNDDB), as well as a listing of special-status mosses, bryophytes, and lichens that were observed or may occur within the project area.
 - iv. Please identify locations of concentration of green monardella on Figure 4 and clarify the amount to be removed versus retained.
 - b. **Cultural Resources:** The Cultural Resources Evaluation prepared by Archaeological Resource Services (April 24, 2020) does not appear to include in its analysis the areas encompassed by the proposed water tank, the proposed access road to Block 19, the retention trench north of Block 17 and the proposed access road from Block 17 to the existing water storage tanks east of the block. Please provide an addendum or update to the Evaluation to include these areas.
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.