

## EXHIBIT B-2



January 26, 2021

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

**RE: Chappellet Vineyard, Napa County ECP – Response to Napa County comments on biological resources (File #P20-00271-ECPA)**

Mr. Barrella:

This letter provides a response to a request from Napa County (County) for additional information/analysis regarding biological resources for the Chappellet Vineyard property located on Sage Ranch Road (Study Area; APNs 032-010-076, -94) near Saint Helena in unincorporated Napa County, California.<sup>1</sup> The request is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Completeness Determination –Chappellet Vineyard Agricultural Erosion Control Plan (ECPA) File #P20-00271-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 2020. This letter is effectively an addendum to WRA's February 2020 report.

The proposed project consists primarily of installation of new vineyard blocks on the property.

### **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. Provide a listing of trees, including species and diameter at breast height (dbh), of trees being removed that are located in areas identified as 'Unsurveyed Areas With Potential Trees' in [BRRS report] Figure A-3 (Tree Survey).*

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<sup>1</sup> The Application Completeness Determination letter references new parcel numbers resulting from remapping by the Assessors Division, i.e., APNs 032-560-022, -033.

The February 2020 BRRS report provided an inventory of trees proposed for removal within the Study Area. However, five specific areas were noted as “Unsurveyed Areas...” because of alterations to the proposed development that included these areas subsequent to the field tree inventory.

It’s is WRA’s understanding that the County approved of a “remote” assessment for these unsurveyed areas, as informed by (field-collected) data from adjacent on-site areas that were surveyed.<sup>2</sup> A qualified WRA plant biologist (Aaron Arthur; co-author) performed the evaluation using available aerial photography and existing tree inventory data. Trees were assigned to likely species based on visual characteristics (i.e., one of the three species recorded during the field inventory). Tree size (DBH in inches) was extrapolated via the field data i.e., using the mean DBH for that species as was field-inventoried across the site.

Trees added via the remote assessment are shown along with the previously inventoried trees in Figure A-1 (Attachment A), and a summary by species with extrapolated size is provided in Table 1. A total of 89 additional trees are now treated as scheduled for removal.

Species	# ground	# remote	Total	Est. DBH remote (in. ± st. dev.)
<i>Quercus agrifolia</i> coast live oak	137	32	169	28.2 ± 24.0
<i>Quercus douglasii</i> blue oak	47	22	69	29.9 ± 17.4
<i>Umbellularia californica</i> California bay	144	35	179	22.4 ± 18.0
<b>Total</b>	<b>328</b>	<b>89</b>	<b>417</b>	-

*ii. 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 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 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. And as noted above, none have been documented from Napa County or the immediate environs with similar chaparral and woodland types.

<sup>2</sup> Personal communication with Mike Muelrath of Applied Civil Engineering, December 23, 2020.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Yakich".

Jason Yakich  
Senior Biologist  
yakich@wra-ca.com

A handwritten signature in black ink, appearing to read "Aaron Arthur".

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

**Enclosures:** Attachment A – Figure  
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 2021.
- California Department of Fish and Wildlife (CDFW). 2021. California Natural Diversity Database (CNDDDB), Wildlife and Habitat Data Analysis Branch. Sacramento, CA. Accessed: January 2021.
- (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 2021.
- Napa County. 2005. Napa County Baseline Data Report. Available at: <http://www.co.napa.us/gov/>.

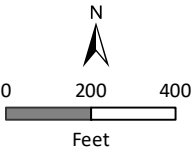




**Figure A-1.**  
**Tree Survey**

Chappellet Vineyard  
Napa County, CA

-  Study Area (232.3 ac.)
-  Project Area (43.0 ac.)
-  Unserved Area (3.5 ac.)
-  Surveyed Tree: Ground (x328)
-  Surveyed Trees: Remote (x89)





**EXHIBIT A**  
**APPLICATION COMPLETENESS DETERMINATION – INFORMATION REQUEST**  
**Chappellet Vineyard Conversion #P20-00271-ECPA: APNs 032-0560-022 &-033**

**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. Project Parcel Identification: Please confirm the Assessor's Parcel Numbers (APN) of the Project Parcels. The APNs identified in the application (032-010-076 &-094) may have recently changed to 032-560-022 & -033 due to recent remapping by the Assessors Division (see enclosed APN Map). Additionally, acknowledgement should be provided for other application submittal material and reports recognizing APN changes to the project parcels and associated parcels.
- b. Project Description – Other Activities and Features: Please provide specific locations and necessary details/descriptions of proposed off-site activities including agricultural chemical storage and mixing, rock storage areas, and rock crushing activities. Locations of these activities including existing and/or proposed access roads can be shown on a separate map or plan sheet, and anticipated trips and equipment should also be detailed (also see #2.d below). Also show the location(s) existing and proposed main irrigation lines, and any proposed water storage tanks or facilities and associated infrastructure (also see #1.e). Any areas of earth disturbance located outside of the project area as currently will need to be accounted for in the project acreage totals.
- c. Project Well(s): Please confirm that the two wells located in proposed Vineyard Block C are the Project Wells, also known as Well 2 (or Vineyard Well) and Well 14 in the project Water Availability Analysis (OEI Inc., February, 2020) (also see #1.e),
- d. Project Slopes: Please confirm and revise project slopes as necessary. The Application Form indicates an approximate slope range from 6% to 20% (with areas also occurring on over 30% slope), and the Supplemental Project Information Form indicates 11% to 25% slopes.
- e. ECPA Plans and/or Narrative: Please provide revised plans or narrative (or addendums thereto) that includes, shows or clarifies the following:
  - i. Location(s) of project well(s), existing and proposed main irrigation lines necessary to supply the proposed vineyard. Also, show any proposed water storage tanks or facilities and associated infrastructure for the project, as applicable (also see Item #1.b).
  - ii. Location(s) of equipment storage and maintenance for vineyard development and operations.
  - iii. Limits of proposed land ripping.
  - iv. For the Vegetation Retention Analysis, please provide clarification or description of what the area removed for other development located within the northern extent of proposed vineyard Block C entailed.

**2. Supplemental Environmental Information:** The following information is necessary for the County to adequately describe the project and 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 Resources Reconnaissance Survey Report prepared by WRA Environmental Consultants (February 2020) that includes and/or expands on the following information so that the environmental setting, project description, and potential impacts of the proposed project can adequately be disclosed and assessed:

- i. Provide a listing of trees, including species and diameter at breast height (dbh), of trees being removed that are located in areas identified as 'Unsurveyed Areas with Potential Trees' in Figure A-3 (Tree Survey).
  - ii. 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 (CNDDB), including a listing of mosses, bryophytes, and lichens occurring or that may occur in the project area.
- b. Landslide Hazard Evaluation: Please provide an addendum or update to the Landslide Hazard Evaluation prepared by OEI Inc (February, 2020) that includes the following information:
- i. The effects on slope stability due to the proposed ECPA related to increased infiltration due to proposed ripping depths. The report should also provide ground preparation recommendations to maintain slope stability.
  - ii. The effects and any changes in sediment delivery amounts based on the project including changes in the amount of sediment delivered to drainageways as compared to existing conditions.
  - iii. The effects and any potential impacts and threats to both on and off-site resources (i.e. aquatic resources and streams) as a result of the project as compared to existing conditions.
- c. Water Availability Analysis (WAA): Please provide an addendum or update to the WAA prepared by OEI Inc (February 2020) that includes, clarifies or confirms the information identified below. Additionally, given the components of the holdings water supply system, and the multiple groundwater uses and wells within the holding, the WAA may need to be peer reviewed by the County's Hydrology Consultant (Luhdorff & Scalmanini: LSCE) to ensure its technical adequacy. If it is determined the WAA will need to be peer reviewed the County will engage with LSCE to prepare a Scope of Work/Cost Estimate for the peer review. You will be notified within 30 days of the date of this letter if a peer review is necessary.
- i. Please confirm that the anticipated groundwater use for the proposed vineyard is 17.1 acre-ft/yr. While the proposed use identified on Page 12 of the WAA indicates 17.1 acre-ft/yr, Table 4 of the WAA appears to indicate 17.5 acre-ft/yr. Also, please clarify the information in Table 4, in particular the additional 23.6 acres of proposed vineyard irrigation resulting in 11.8 acre-ft/yr of groundwater use (it may be associated with proposed vineyard on APN 032-010-094, but as shown appears to be in addition to the proposed 34 net acres of vineyard under this application).
  - ii. Confirm that the Project Recharge Area (or Project Aquifer Recharge Area) is the blue cross-hatched area identified as the *Aquifer Recharge Area* in Figures 4, 5, 8 and 9.
  - iii. Please clarify/confirm that the Proposed Chappellet Winery references in the WAA are associated with Chappellet Winery Use Permit Major Modification #P18-00307-MOD approved on May 20, 2020. Also, please confirm the information provided in Tables 8 through 10 is based on #P18-00307-MOD as approved. Identifying or otherwise titling components as 'proposed' gives the impression that more than vineyard is being proposed as part of this application: adding clarifying footnotes or references where appropriate is recommended.
  - iv. Please confirm that the estimated groundwater recharge has taken into account areas that may have limited groundwater recharge potential, such as areas of the Aquifer Recharge Area and of the Project Parcels containing excessive slopes (i.e. greater than 30%), that could affect potential groundwater recharge.

- 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 (including rock disposal), erosion control plan installation (including importation of, soil amendments or other materials), vineyard installation, and ongoing vineyard operations. Furthermore, because this an expansion to the existing vineyard being operated on-site, please identify if existing employees associated with existing operations are anticipated to be utilized to install and operate the proposed vineyard. This information is necessary to disclose and assess potential traffic, air quality, and climate change impacts associated with project development and operational activities.
- e. Water Rights Information: Please provide for the application record water rights permit and licensing information associated with on-site/holding reservoir(s). While the proposed project would rely on groundwater, water right information is necessary for a complete application record and disclosure purposes.

**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.