

Exhibit B-2



June 11, 2025

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

Subject: Keller Yountville Vineyard, Napa County ECPA – Response to Napa County comments on biological resources (File #P25-00080-ECPA)

Don:

This letter provides a response to a request from Napa County (County) for additional information/analysis regarding biological resources for the property located at 275 Long Ranch Road (Study Area; APN 032-030-070) in unincorporated Napa County, California. The request is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Completeness Determination, Keller Yountville Vineyard Agricultural Erosion Control Plan (ECPA) #P25-00080-ECPA*, and made in the context of a previous Biological Resources Reconnaissance Survey (BRRS) report covering the site/project by WRA, Inc. (WRA) dated March 2025.

The proposed project is the installation of three new vineyard blocks, resulting in approximately 16.7 acres of total disturbance limits (Project Area).

1.1 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 A.

1. Agricultural Erosion Control Plan Application Completeness Items...

b. Biological Resource Information: Please provide an update or addendum to the Biological Resource Survey (WRA Inc., March 2025) that includes the following:

i. An assessment of the quality of the various special-status plant species habitats within the proposed project area and within the property/survey area. The assessment should also identify other potential special-status plant species habitat such as rock outcrops.

ii. An assessment of the quality, in terms of biological/ecologic and foraging value, of the various Plant Communities or Land Cover types occurring on the property and project area.

As described in the BRRS report five land cover types are present within the Study Area: developed, chamise chaparral, scrub oak chaparral, blue gum grove, and ephemeral streams. The Project Area (i.e., new vineyard blocks and clearing limits) has been intentionally sited to avoid all sensitive aquatic resources and will impact only developed, chamise chaparral, and scrub oak chaparral land cover types.

The Study Area contains rock outcrops and rocky substrates within otherwise chamise chaparral and scrub oak chaparral; however, WRA did not observe substantial rock outcrops that merited independent mapping. Likewise, WRA did not note any substantive differences in special-status plant density between extremely rocky areas and lesser rocky areas within the on-site chaparral communities.

The developed areas provide little ecological value aside for marginal foraging habitat for some common wildlife species, e.g., within landscaped areas associated with residences.

The chamise chaparral within the Study Area (including the Project Area) is dominated by chamise (*Adenostoma fasciculatum*) with relatively limited shrub diversity compared to other chaparral types found in the greater vicinity. This is the primary land cover type supporting special-status plants in the Study Area. The quality of chamise chaparral appears to be homogeneous across the Study Area, with no discernible differences between areas proposed for conversion and retention save for the immediate vicinity of the residences where fire mitigation practices have been implemented. It is noteworthy that the on-site area with the highest diversity of special-status plant species, located between the two residences, will be retained; shrub cover is relatively sparse in this area. On-site chamise chaparral provides habitat for a variety of common wildlife species including chaparral/scrub-associated birds (nesting and foraging), more generalist birds, black-tailed deer (*Odocoileus hemionus columbianus*), common reptile species, and others.

The scrub oak chaparral is dominated by scrub oak (*Quercus berberidifolia*), with a mix of other sub-dominant canopy species. This land cover type also supports populations of special-status plants within the Study Area, and there are no discernible differences in quality between areas proposed for conversion and retention. As with chamise chaparral, on-site scrub oak chaparral provides habitat for numerous common wildlife species, as well as native plants. The diversity of associated wildlife species is likely higher on average than chamise chaparral, given the more complex canopy, higher plant diversity, and greater abundance of oak acorns. Approximately 84 percent of this land cover type would be avoided by the Project.

The blue gum groves in the southernmost portion of the Study Area are entirely composed of non-native blue gum (*Eucalyptus globulus*). As is typical of such groves the understory is low-growing and relatively bare. Regionally, eucalyptus trees do often provide nesting habitat for raptors and some other native birds.



The on-site ephemeral streams area run during and immediately following substantial rainfall and do not feature characteristic riparian vegetation. However, the streams likely provide temporary water resources for wildlife (and some plants) when inundated.

iii. The approximate density (in plants per acre) of the special-status plant species located within the project and study areas.

Based on the results of botanical surveys in 2023, approximate densities of the special-status plant species within the retained (non-impacted) portion of the Study Area and Project Area are presented in Table 1.¹ Densities were calculated based on the estimated number of individuals within occupied on-site acreages; non-impacted values do not include populations within the (pre-existing) Preservation Areas. Because numerical abundance for several species is expected to vary from year to year, particularly for annuals, special-status plants were mapped based on occupied acreages. Occupied areas reflect suitable habitat conditions and thus are a better representation of on-site distribution, accounting for variable interannual conditions.

Also note that density calculations for two species are based on very limited occupied acreages, and thus are at least partially artifacts of these distributions (see Table 2 below).

Table 1: Approximate Density of Special-status Plants

SPECIES	DENSITY (#/ACRE)	
	RETAINED*	PROJECT AREA
narrow-anthered brodiaea <i>Brodiaea leptandra</i>	581	422
holly-leaved ceanothus <i>Ceanothus purpureus</i>	70.2	114
Greene's narrow-leaved fleabane ** <i>Erigeron greenei</i>	1,575	0
Sharsmith's western flax <i>Hesperolinon sharsmithiae</i>	3485	6,146
Napa biscuitroot ** <i>Lomatium repostum</i>	867	2,000

* Does not include the Preservation Areas.

** Species with a very limited on-site spatial distribution.

¹ As referenced in the BRRS report, green monardella (*Monardella viridis*) was observed to be numerous throughout much of the Study Area with a distribution closely associated with that of holly-leaved ceanothus. Given its abundance (a minimum of tens of thousands of plants), this species was not mapped.



iv. A breakdown in table format of special-status plant species removal and retention within the study area in terms of individuals and acreages of removal and retention.

Removal and retention of special-status plant species by acreage and count is summarized in Table 2. Note that counts for all species save Green’s narrow-leaved fleabane would increase if the populations in the Preservation Areas were included.

Table 2: Removal and Retention of Special-status Plants

SPECIES	RETENTION*		REMOVAL	
	Acres	Count	Acres	Count
narrow-anthered brodiaea <i>Brodiaea leptandra</i>	0.37	215	0.09	38
holly-leaved ceanothus <i>Ceanothus purpureus</i>	66.5	4,666	16.2	1,840
Greene’s narrow-leaved fleabane ** <i>Erigeron greenei</i>	0.04	63	0	0
Sharsmith’s western flax <i>Hesperolinon sharsmithiae</i>	6.5	22,510	2.5	15,243
Napa biscuitroot ** <i>Lomatium repostum</i>	0.015	13	0.001	2

* Does not include the Preservation Areas.

** Species with a very limited on-site spatial distribution.

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

Sincerely,



Jason Yakich
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Aaron Arthur
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Enclosures:

Attachment A – Excerpt pages from County letter



EXHIBIT A
APPLICATION COMPLETENESS DETERMINATION – INFORMATION REQUEST
Keller Yountville Vineyard #P25-00080-ECPA: APN 032-030-070

- 1. Agricultural Erosion Control Plan Application Completeness Items:** This information is necessary to; 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. Landslide Hazard Evaluation: Please provide a Landslide Hazard Evaluation for the portions of the proposed project that are located in the Rector Reservoir Domestic Watershed, and for the proposed rock benches at bottom of Vineyard Blocks A and B, 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.
- b. Biological Resource Information: Please provide an update or addendum to the Biological Resource Survey (WRA Inc., March 2025) that includes the following:
- i. An assessment of the quality of the various special-status plant species habitats within the proposed project area and within the property/survey area. The assessment should also identify other potential special-status plant species habitat such as rock outcrops.
 - ii. An assessment of the quality, in terms of biological/ecologic and foraging value, of the various Plant Communities or Land Cover types occurring on the property and project area.
 - iii. The approximate density (in plants per acre) of the special-status plant species located within the project and study areas.
 - iv. A breakdown in table format of special-status plant species removal and retention within the study area in terms of individuals and acreages of removal and retention.
- c. ECPA Plans and/or Narrative: Please provide revised plans and/or narrative that include, show or clarifying the following:
- i. Locations of existing and proposed irrigation main lines.
 - ii. Confirmation that no new wildlife exclusion fencing (i.e. deer fencing) is proposed as part of the project. Also provide the locations of any other wildlife exclusion fencing within the holding or confirmation that there is no other existing fencing. If wildlife exclusions fencing is proposed, provide locations and design details.
 - iii. Confirmation that no new water storage tanks/facilities are proposed as part of the project.
- i. Water Availability Analysis (WAA): Please provide an update or addendum to the project WAA (RCS & Associates, March 14, 2025) that includes a graphic representation (figure) of the areas with slopes exceeding 30% identified in the *Parcel-Specific Effect of Slope on Groundwater Recharge Area*.
- 2. Supplemental Environmental Information:** The following information is necessary for the County to; adequately disclose and evaluate potential impacts of the proposed project pursuant to CEQA; assess the project's compliance with applicable General Plan Goals and Policies and the County Conservation Regulations; and to complete the ECPA application to continue its review and processing.

- a. **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, erosion control plan installation (including importation of, soil amendments or other materials), and vineyard installation, This information is necessary to disclose and assess potential traffic, air quality, and climate change impacts associated with project development and operational activities.
3. **Notification Information/Listing:** A listing of the current owners of properties located within 1,000 feet of the project holding will be necessary to circulate the CEQA document. 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.