

EXHIBIT B-2



December 19, 2018

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

RE: Ovid Vineyard, Napa County ECP – Response to Napa County comments on biological resources

Dear Mr. Barrella:

This letter provides a response to a request from Napa County for additional information/analysis regarding biological resources for the property located at 255 Long Ranch Road (APNs 032-030-065, -066) in Saint Helena, Napa County, California. The request is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Completeness Determination – Metamorphosis Wines, Ovid Vineyard Agricultural Erosion Control Plan (ECPA) File #P18-00275-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 July 2018. This letter is effectively an addendum to WRA's July 2018 report, the purpose of which is to provide an updated project description and address the County's request.

The proposed project is the installation of new vineyard blocks on the property. The original project description as outlined in the July 2018 BRRS report featured 38.9 gross acres of new vineyards (inclusive of the maximum grading limits). To reduce impacts to special-status plants that occur on-site, WRA recommends that the vineyard expansion be reduced to a total of 24.8 gross acres of vineyards and associated grading. A summary of the retention of special-status species and biological communities in both the original and recommended projects is provided in Table 1. The recommended vineyard blocks overlap with on-site biological communities and special-status plant populations are respectively shown in Figures 1 and 2 (Attachment A).

Table 1. Retention of biological communities and special-status plants between the original and recommended proposed projects

Biological Feature	Original proposed vineyard blocks			Recommended vineyard blocks		
	Acreage	Count	% Retention	Acreage	Count	% Retention
green monardella	13.98	not determined	43%	6.31	not determined	74%
holly-leaved ceanothus	13.98	1495	43%	6.31	601	74%
Napa lomatium	0.01	18	30%	0	0	100%
narrow-anthered brodiaea	0.32	388	27%	0.02	21	96%
Sharsmith's western flax	0.08	563	27%	0.01	29	91%
Biological Communities	Acreage		% Retention	Acreage		% Retention
Agriculture	3.11		15.2%	3.07		15.0%
Annual Brome Grassland	6.18		92.4%	4.53		67.7%
Broom Patch	0.85		80.2%	0.58		54.7%
California Bay Forest*	3.03		39.6%	2.9		37.9%
Chamise Chaparral	15.34		75.9%	7.09		35.1%
Developed/Landscaped	5.55		48.1%	5.3		45.9%
Eastwood Manzanita Chaparral	1.66		97.1%	0.49		28.7%
Interior Live Oak Woodland	0.95		43.8%	0.48		22.1%
Leather Oak Woodland*	0.61		32.3%	0.36		19.0%

*Considered sensitive by Napa County

Response to County Request

In the context of the recommended changes to the vineyard expansion as outlined above, the section below directly addresses the comments from the County point-by-point (with text from the County in *italics*); the relevant page from the County's letter is included as Attachment B.

2. Supplemental Environmental Information...

a. Biological Resource Information...

i. An assessment and impact analysis associated with potential cumulative impacts associated with the loss of special-status plants and their habitat.

The property contains chaparral, primarily chamise chaparral and leather oak chaparral, much of which supports both a diversity and high density of special-status plants. It is recommended that the project be redesigned to avoid those areas supporting the highest density and diversity of special-status plant populations (Figure 2), which would be maintained as open chaparral to provide continued habitat for these (and other) plants. The recommended vineyard blocks provide less fragmentation of on-site chaparral, and include connectivity to adjacent properties. Maintaining this connectivity should provide for continued cross-pollination and gene flow, as well as local wildlife movement (see item *iv.* below). Furthermore, the adjacent properties are composed of these same habitats that support a similar suite of plants, presumably including those special-status plants documented on the property. The retention of the majority of the documented special-status plants (see Table 1) in connected habitat blocks would provide the opportunity for these species to maintain viable populations both on the property and, more broadly, in the region.

ii. Recommended buffers, including rationale, for special-status plants and populations.

A minimum 50-foot buffer should be provided for all avoided Napa lomatium (*Lomatium repostum*, CRPR 4), narrow-anthered brodiaea (*Brodiaea leptandra*, CRPR 1B), and Sharsmith's western flax (*Hesperolinon sharsmithiae*, CRPR 1B), as well as for a majority of the green monardella (*Monardella viridis*, CRPR 4) and holly-leaved ceanothus (*Ceanothus purpureus*, CRPR 1B) located outside of the recommended vineyard blocks (Figure 2).

A 50-foot setback of retained/native vegetation will be adequate to provide continued buffering to the existing populations of Napa lomatium, narrow-anthered brodiaea, and Sharsmith's western flax from grading effects, dust and sediment migration, and the presence of invasive species.

Holly-leaved ceanothus and green monardella are relatively tolerant of disturbance, and have been repeatedly observed by WRA on the edge of vineyard avenues as well as in other disturbed areas in Napa County. Peripheral remnant individuals of these species are unlikely to be negatively affected by the new vineyards, while those situated deeper within the proposed remnant habitat will be provided with the same buffering benefits as noted above.

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

Searches of the California Natural Diversity Database (CNDDDB; CDFW 2018a), California Native Plant Society Electronic Inventory (CNPS 2018), Calflora Electronic Inventory (Calflora 2018), 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 2018b). Few special-status bryophytes or lichens as listed in the databases above have been documented from chaparral. As noted above, none have been documented from Napa County or the immediate environs with similar chaparral types. Chaparral is a broadly defined vegetation type that encompasses numerous plant assemblages and soil types (and other physical factors). The chaparral types (vegetation alliances combined with soil types) in the subject property are restricted to the Mayacama Mountains.

iv. An assessment of wildlife movement corridors/areas within the holding, including any recommendations to reestablish wildlife movement corridors.

To account for potential impacts to wildlife movement/migratory corridors, WRA reviewed maps from the California Essential Connectivity Project (CDFW and CalTrans 2010) and the NCBDR (Napa County 2005). Additionally, aerial imagery (Google 2018) for the local area was referenced to assess if local core habitat areas were present within, or connected to the Study Area. This assessment was refined based on observations of on-site physical and/or biological conditions.

As per CDFW and Caltrans (2010) the Study Area is located within a mapped "Essential Connectivity Area," specifically a large, north-south oriented tract of land east of Napa

Valley. The Study Area is located near the western edge of this mapped area, which is approximately 8.4 miles wide in that vicinity. At the scale of landscape linkages, this tract provides connectivity between baylands of San Pablo Bay and areas from northern Napa County northward. Given the relatively small size of the Study Area (relative to the width of the corridor tract) and the lack of apparent development impacts within the more central portion of this tract, agricultural expansion within the Study Area is in and of itself unlikely to result in any significant impacts to wildlife movement or migration at the landscape-linkage scale. At a more local scale, the Study Area provides connectivity between a patchwork of undeveloped lands (primarily chaparral, grassland, and woodlands), and agricultural (vineyards) and low-density, rural developments. While the proposed project (vineyard blocks) will result in portions of the site having reduced potential for on-site wildlife movement, the retention of blocks of chaparral with direct connectivity with similar habitats on neighboring properties will allow for continued local wildlife movement.

Additionally, it is important to note that a deer fence currently surrounds most of the property, and also encloses neighboring properties to the east and west. The only proposed change to this fencing array would be the inclusion within the fenced area of an approximately 4.3-acre area along the southwestern boundary of the property, which consists primarily of chaparral. Though the subject area is currently unfenced, it effectively “dead ends” within the property, and does not function as a local movement corridor for wildlife already restricted by the deer fencing. As such, the proposed alterations to the deer fencing array will not introduce any new movement barriers to wildlife.

v. Provide additional details, including an assessment and impact analysis associated with the [BRRS] identified in Table 3.

The following is offered to clarify the biological community approach that WRA utilized for the property and project.

Using multiple sources (Holland 1986, Sawyer et al. 2009, Thorne et al. 2004), WRA performed biological community (including natural communities) mapping using both ground-based methods and aerial photography. WRA then described these communities, using applicable synonyms as given in the Napa County Landcover map (Thorne et al. 2004). For Table 3 in the July 2018 BRRS report, WRA compared acreages of the communities found within the subject property to the acreages of those communities as mapped more broadly within the respective watersheds; other communities found within the watershed(s) that were not present within the property were not included in analysis. As such, the acreages shown in Table 3 do not represent the entirety of those watersheds.

It is unclear to WRA what would be achieved by producing a map of the vegetation communities of the relevant watersheds, as requested. The data mentioned are publicly available and held by the County of Napa. All project-level impacts have been addressed via the recommended vineyard blocks provided herein, and the potential for cumulative-level impacts will presumably be analyzed in the California Environmental Quality Act document prepared for this project. Therefore, this request is respectfully declined at this time pending any clarification.

WRA’s rationale and methodology for mapping areas as Agriculture is presumably different from that applied by Summit Engineering Inc. in the WAA (water availability analysis; June 2018). For the purposes of biological communities, agricultural area boundaries are mapped based on distinct shifts in vegetation (planted species, weeds,

remnant natives) and modified soils (fertilized, tilled). Based on these features formulating the boundary of agricultural areas, the recommended vineyard blocks will convert approximately 3.07 acres from orchard to vineyard.

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

Sincerely,



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



Jason Yakich
Associate Wildlife Biologist
yakich@wra-ca.com

Enclosures: Attachment A – Figures
Attachment B – Excerpt page from County letter

REFERENCES

- Calflora. 2018. Website: Information on wild California plants for conservation, education, and appreciation. Available at: <http://www.calflora.org/>. Accessed: December 2018.
- California Department of Fish and Wildlife (CDFW). 2018a. California Natural Diversity Database (CNDDDB), Wildlife and Habitat Data Analysis Branch. Sacramento, CA. Accessed: December 2018.
- (CDFW) and California Department of Transportation (CalTrans). 2010. California Essential Habitat Connectivity Project. Available at: <https://nrm.dfg.ca.gov/>. Accessed: September 2018.
- California Native Plant Society (CNPS). 2018. Online Inventory of Rare, Threatened, and Endangered Plants of California. Available at: <http://www.rareplants.cnps.org/>. Accessed: December 2018.
- Google. 2018. Google Earth Aerial Images, 1993-2018. Online at: <http://www.google.com/earth/download/ge/agree.html>. Most recently accessed: December 2018.
- Holland, R. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. California Department of Fish and Game, Sacramento, CA. 156 pp.
- Napa County. 2005. Napa County Baseline Data Report. Available at: <http://www.co.napa.us/gov/>.
- Sawyer, J., Keeler-Wolf, T., and J. Evens. 2009. A Manual of California Vegetation, 2nd Edition. California Native Plant Society in collaboration with California Department of Fish and Game. Sacramento, CA. 1300 pp.
- Thorne, J., Kennedy, J., Quinn, J., McCoy, and T. Keeler-Wolfe. 2004. A Vegetation Map of Napa County Using the Manual of California Vegetation Classification and its Comparison to Other Digital Vegetation Maps. Information Center for the Environment (ICE). University of California, Davis.

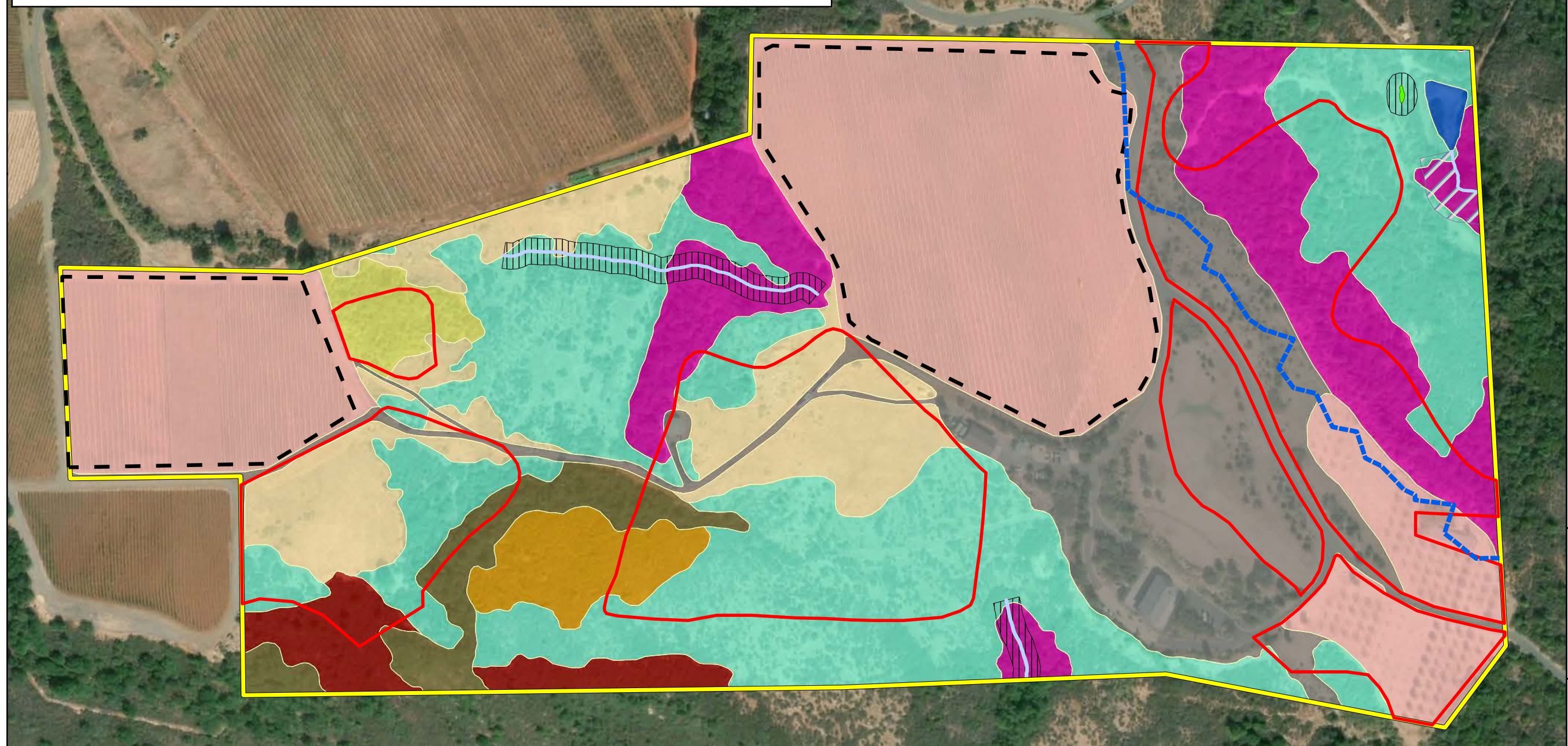


Ovid Winery
Napa County,
California

Figure 1.
Biological Communities
and Napa County
Constraints

Study Area (73.62 ac.)	Seasonal Wetland (0.01 ac.)	
Existing Vineyard Block	Leather Oak Chaparral (1.89 ac.)	
Recommended Vineyard Block Clearing Limits (24.80 ac.)	Non-sensitive Communities	
Sensitive Domestic Water Supply Drainage	Agriculture (20.45 ac.)	California Bay Forest (7.66 ac.)
65' County Setback	Annual Brome Grassland (6.69 ac.)	Ephemeral Stream (0.05 ac. & 982 linear ft.)
26' Undisturbed Filter Strip	Broom Patch (1.06 ac.)	Pond (0.19 ac.)
Sensitive Communities		Chamise Chaparral (20.22 ac.)
California Bay Forest (7.66 ac.)	Developed/ Landscaped (11.54 ac.)	Interior Live Oak Chaparral (2.17 ac.)
Ephemeral Stream (0.05 ac. & 982 linear ft.)	Eastwood Manzanita Chaparral (1.71 ac.)	
Pond (0.19 ac.)	Interior Live Oak Chaparral (2.17 ac.)	

Impacts within Recommended Vineyard Blocks:
 - Agriculture 3.07 ac.
 - Annual Brome Grassland 4.53 ac.
 - Broom Patch 0.58 ac.
 - California Bay Forest 2.90 ac.
 - Chamise Chaparral 7.09 ac.
 - Developed/Landscaped 5.30 ac.
 - Eastwood Manzanita Chaparral 0.49 ac.
 - Interior Live Oak Woodland 0.48 ac.
 - Leather Oak Chaparral 0.36 ac.



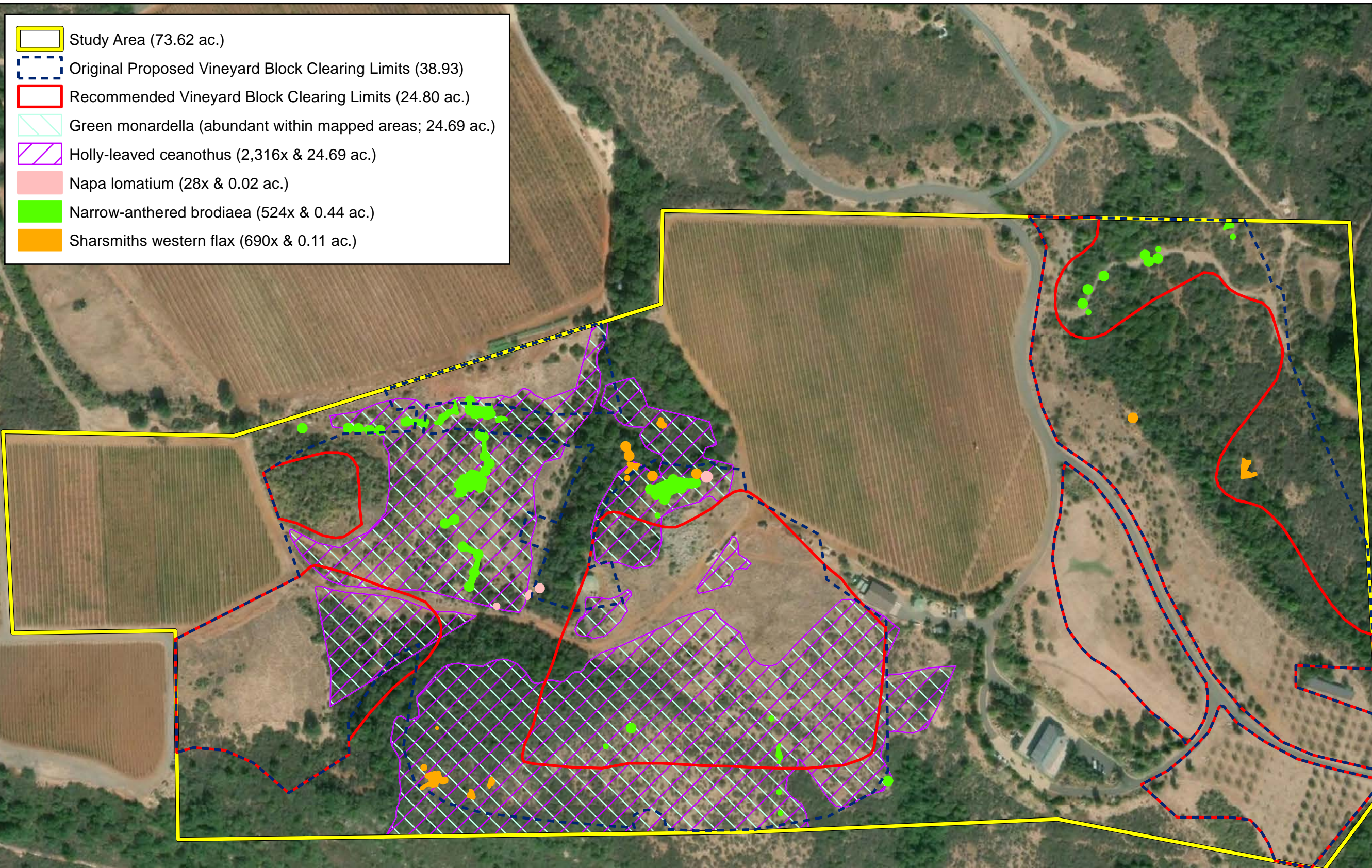
Map Prepared Date: 12/19/2018
 Map Prepared By: mrochelle
 Base Source: Esri Streaming - NAIP 2014
 Data Source(s): WRA



Ovid Winery

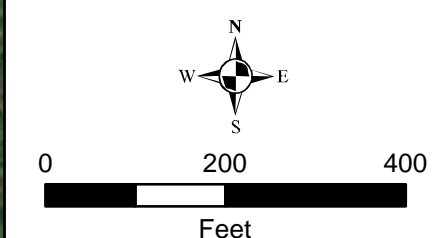
Napa County,
California

Figure 2.
Rare Plant Survey Results



- Study Area (73.62 ac.)
- Original Proposed Vineyard Block Clearing Limits (38.93)
- Recommended Vineyard Block Clearing Limits (24.80 ac.)
- Green monardella (abundant within mapped areas; 24.69 ac.)
- Holly-leaved ceanothus (2,316x & 24.69 ac.)
- Napa lomatium (28x & 0.02 ac.)
- Narrow-anthered brodiaea (524x & 0.44 ac.)
- Sharsmiths western flax (690x & 0.11 ac.)

Species	Within Original Proposed Blocks			Within Recommended Blocks		
	Acre(s)	Count	% Retention	Acre(s)	Count	% Retention
Green monardella	13.98	Not Determined	43%	6.31	Not Determined	74%
Holly-leaved ceanothus	13.98	1,495	43%	6.31	601	74%
Napa lomatium	0.01	18	30%	0	0	100%
Narrow-anthered brodiaea	0.32	388	27%	0.02	21	96%
Sharsmiths western flax	0.08	563	27%	0.01	29	91%



Map Prepared Date: 12/19/2018
 Map Prepared By: mrochelle
 Base Source: Esri Streaming - NAIP 2014
 Data Source(s): WRA

not been initiated. This information is necessary to clearly show the post 1993 conditions, and to maintain an accurate accounting of development in context of 1993 parcel configurations and conditions pursuant to NCC Section 18.108.027(B).

- ii. Fencing: A complete fencing plan showing the location and details (or description) of existing wildlife exclusion fencing encircling the project area even if it extends off-site, and the date(s) fencing was installed. The plan should identify existing fencing to be removed to accommodate the project, and include a design detail of proposed fencing. Additionally, it is recommended that fencing design include exit gates at the corners of fenced areas to allow entrapped animals a way to escape and the any wire utilized to top exclusion fencing be smooth wire rather than barbed wire to prevent entanglement.
- iii. Application From: Because two of the project wells are located on an adjacent parcel (APN 032-030-068: Lands of Nelson and Johnson) a completed and signed ECPA Application Form (enclosed) from that owner is required.

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: Please provide an addendum or update to the Biological Resource Reconnaissance Survey Report prepared by WRA Environmental Consultants (July 2018) that includes or clarifies the following information:
 - i. An assessment and impact analysis associated with potential cumulative impacts associated with the loss of special-status plant species and their habitat. While the Report is silent on special-status plant species habitat, the high concentrations and diversity of special-status and sensitive plant species located throughout the holding (in addition to other native plant species), suggests that special-status plant species habitat occurs throughout holding.
 - ii. Recommended buffers, including rationale, from special-status plants and populations. Buffers should be large enough to maintain the viability of these special-status plant populations.
 - iii. A discussion and impact analysis of any special-status mosses, bryophytes, and lichens that are known to occur in the area as identified in the California Natural Diversity Database (CNDDDB) including a listing of mosses, bryophytes, and lichens occurring in the project area.
 - iv. An assessment of wildlife movement corridors/areas within the holding, including any recommendations to reestablish wildlife movement corridors. Existing development in conjunction with proposed development within the holding appears to eliminate wildlife movement potential through the holding.
 - v. Provide additional details, including an assessment and impact analysis associated with the Biological Resources Reconnaissance Surveys identified in Table 3. Based on the information provided and the areas identified (Vinehill Creek Drainage and Lake Hennessy Drainage) total approximately 2,956 acres; however, Napa County GIS Sensitive Maps indicate these Drainages total 7,243 acres (Vinehill Creek \pm 2,078 acres and Lake Hennessy Drainage \pm 5,165 acres). It is recommended a figure showing these drainages and vegetation alliances be included in the Report addendum/update. Additionally, confirm the amount of existing agriculture/orchard that will be removed as part of the project: Table 3 indicates \pm 3.1 acres; however, the WAA indicates \pm 4.5 acres (also see Item #2.b.iv below).
- b. Water Availability Analysis (WAA): Please provide an update or addendum to the WAA prepared by Summit Engineering Inc. (June 2018) that includes or clarifies the information identified below. This