

Exhibit B-2



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June 11, 2019

Ms. Diane Wilson
Napa Valley Vineyard Engineering, Inc.
176 Main St. Suite B
St. Helena, CA 94574

RE: Response to Napa County Review Letter (Exhibit A) for the Atlas Peak II Vineyard Biological Resource Assessment

Dear Ms. Wilson:

This letter will provide our response to the above-referenced Napa County review letter for the Atlas Peak II Vineyard Biological Assessment, which was completed in 2018. Our responses will be provided in the order listed in the review letter.

Comment a.i.:

- i. *Figure 2 appears to map mixed oak woodland down to individual tree. The Manual of California Vegetation defines the Mixed oak forest alliance as having a canopy that is intermittent to continuous. The vegetation map should reflect areas that meet the requirements of this alliance, not individual trees within the grassland. Areas that meet the mixed oak alliance definition should be mapped as such, even if interspersed with grassland. Table 1 should be updated to reflect any change in vegetation mapping.*

Response:

The Manual of California Vegetation defines the structural morphology of Mixed Oak Forest as follows:

Trees <30m; canopy is intermittent to continuous, and may be two tiered. Shrubs are infrequent or common. Herbaceous layer is sparse or abundant, may be grassy¹.

¹ Underlines added for emphasis.

The vegetation mapping provided in Figure 2 of the assessment report complies precisely with that definition. Oaks, including seedlings and the associated shrub layer, are mapped within a matrix of wild oat grassland. The level of detail provided in the map provides important information regarding the association of forest and grassland edge. This is accomplished by showing the small inclusions of grassland within the forest and the adjacent trees along the edges of the forest and in openings. The structure and importance of this association would be lost with the use of a simple, generalized polygon.

If questions remain on behalf of county staff regarding the mapping technique used in Figure 2, we recommend that it be subjected to a peer review by a qualified professional field biologist with a working knowledge of the Manual of California Vegetation and pertinent experience with the botany of this bioregion. Alternatively, we would be willing to attend the Planning Commission hearing for this project and explain our mapping technique.

Comment a.ii.:

- ii. *An assessment and impact analysis associated with the loss of potentially suitable habitat for special-status wildlife species that may be located within the project area, including white-tailed kit, Lawrence's goldfinch, Lewis' woodpecker, loggerhead shrike, and pallid bat. The Biological Resource Assessment indicates potential habitat for several special-status bird species, and notes the importance of edge habitat, of which the property contains significant amounts. The assessment should include a qualitative analysis of potential special-status species habitat within the subject parcel and how much is affected by the project and if the loss of this habitat is potentially significant.*

Response:

Our discussion of the potential presence of sensitive wildlife, potential project impacts, and proposed mitigation is provided in the following locations within the Biological Resource Assessment:

Section 4.4: This section discusses the potential presence and habitat requirements of sensitive wildlife within the project boundaries. The assessment then provides an extensive discussion of the wildlife habitat characteristics of the project area, addressing its properties, value, potential for impact, and proposed mitigation. This information relates directly to the identified habitats for these sensitive species and the potential for the project to impact them. This information is provided in the sections below.

Section 7.3: This section discusses the wildlife value of woodlands and adjacent edge habitats within the survey area. Specifically, it addresses:

- Core Habitat Value
- Cover and Edge Habitat including its value to raptors and large herbivores
- Value and location of wildlife corridors
- Presence of critical plant and wildlife resources including sources of upland water

Section 8.3: This section specifically addresses wildlife corridors within the project area including their value, location, and potential for impact.

Section 9.2: This section addresses potential project-related impacts and proposed mitigation for each of the following biological resources:

- Habitat fragmentation
- Woodland and Forest Resources
- Sensitive Plants and Wildlife
- Critical Wildlife Resources

In each case, potential impacts to the habitats of the sensitive wildlife species identified in Section 4.4 represent impacts to those species. Proposed mitigation for those impacts would therefore mitigate impacts to those species. Additionally, where proposed activities would directly impact sensitive species, these impacts are called out and mitigation is proposed under the heading of "wildlife" in Section 9.2 as discussed below.

With specific reference to the question regarding the value of edge in Comment a.ii. the discussion of edge habitat in Section 7.3 notes that the project would specifically impact raptors, which include edge habitat and open grassland in their hunting range. As noted, the impact would primarily be a change in game species within the future vineyard. We note that vineyard operators encourage the presence of raptors as a means of rodent control.

Other sensitive species (passerines) are not specifically called out here (in the discussion of edge habitat) because the potential for impact to them is minimal due to their smaller range requirements and the extensive amount of core and edge habitat available within unaffected portions of the property (as shown by the extensive mix of forest and grassland mapped in Figure 2).

Where impacts to the listed sensitive birds and bats (and non-sensitive birds and bats) would occur as a result of tree cutting, etc., this is specifically addressed and mitigated

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in Section 9.2 under the heading of "wildlife", and mitigated in Measure 3 under "Birds" and "Bats".

Please feel free to give me a call if you need other assistance with the project.

Sincerely,

A handwritten signature in blue ink that reads "Steve Zalusky". The signature is fluid and cursive, with the first name "Steve" and last name "Zalusky" clearly legible.

Steve Zalusky
Principal Biologist