



July 14, 2021

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

**Re: Kenzo Estate Vineyard, Napa County ECP – Response to Napa County comments on biological resources (File # P21-00086-ECPA)**

Ms. Arifian:

This letter provides a response to a request from Napa County (County) for additional information/analysis regarding biological resources at Kenzo Estate Vineyard, located at 8999 Wild Horse Valley Road (APNs 033-190-014, -015, -130-046) in unincorporated Napa County, California. The request is outlined in a letter from the Planning, Building, and Environmental Services Department, *Application Completeness Determination – Kenzo Estate Vineyard Agricultural Erosion Control Plan (ECPA) # P21-00086-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 January 2021. This letter is effectively an addendum to WRA's January 2021 report.

### **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-ii. Figure A-7 does not include APN 033-190-014...Please revise aerial baseline and [BRRS report] Section 6.1.1 regarding vegetation removal and retention accordingly.*

*ii. Please provide details of oak woodland acreage and proposed removal on each parcel to evaluate the requirements for retention and mitigation pursuant to Conservation Regulations 18.108.020(D) and 18.108.027(B) for each parcel.*

The extent of oak woodlands and proposed impacts to these woodlands on a per-parcel basis is shown in Figure A-1 (Attachment A) and summarized in Table 1.

Table 1. Oak Woodlands By Project Parcel

Parcel (APN)	Oak woodlands present (acres)	Proposed impacts (acres)	Percent retention
033-190-014	12.1	0.0	100
033-190-015	58.7	1.7	97
033-130-046	140.7	1.5	99

As is the case with the two primary project parcels in aggregate (outlined in the BRRS report), retention of oak woodlands within each of the three respective project parcels substantially exceeds County General Plan requirements for oak woodland (acreage) and canopy retention.

*iii. Provide additional information and details on any significant trees (i.e., Trees with Unique Wildlife Value such as bat habitat, etc.) within the project area and ecological benefits they may provide.*

On July 2, 2021 a field assessment was performed by WRA biologists Jason Yakich and Aaron Arthur (co-authors), focused on all trees scheduled for removal specifically, and adjacent woodland stands more generally. Trees scheduled for removal were identified using a GPS unit loaded with the limits of development. The assessment focused on potential bat roosting habitat/substrates within the trees, but included other indicators of notable wildlife use, e.g. the presence of raptor nest structures.

Most of the trees scheduled for removal are coast live oaks (*Quercus agrifolia*), with smaller numbers of Pacific madrones (*Arbutus menziesii*) and blue oaks (*Q. douglasii*) also included. Five individual coast live oaks and one blue oak scheduled for removal were noted as providing potential bat roosting substrates; locations of these trees are shown in Figure A-2 (Attachment A). The focal trees each contained at least one apparent hollow within the trunk and/or a sizeable limb, with ingress/egress points; the quality of these features overall (relative to bats) may have been enhanced via recent fire impacts to the stand. Given the solar exposure and presumed internal temperature variations, these features are not suitable for winter hibernation use by bats but may be used as day/night roosts, and potentially as maternity roosts by some species. No raptor nest structures or other notable elements were observed within the trees scheduled for removal.

Adjacent woodland stands in the vicinity of the project disturbance limits feature similar characteristics overall to those described above, including the dominant tree species and tree density, apparent age/size of the stands, and indications of fire impact. Several larger oaks were observed with apparent hollows that may support bat roosting.

Recommendation 1 in the BRRS report addresses avoidance of potential impacts to bats, which should be applied to the six focal trees described herein. In summary, it is recommended that these trees be removed from September 1 to March 31, outside of the general bat maternity

season. If removal during this period is not feasible, a pre-removal survey effort should be performed by a qualified biologist to determine if active bat roosts are present. If special-status bats or bat maternity roosts are detected, then the trees should be avoided until the end of the maternity period, or until appropriate species- and roost-specific measures mitigation measures have been developed in consultation with California Department of Fish and Wildlife (CDFW). Irrespective of time of year, once felled, the focal trees should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing, to allow any bats present within the felled trees to escape.

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

Sincerely,

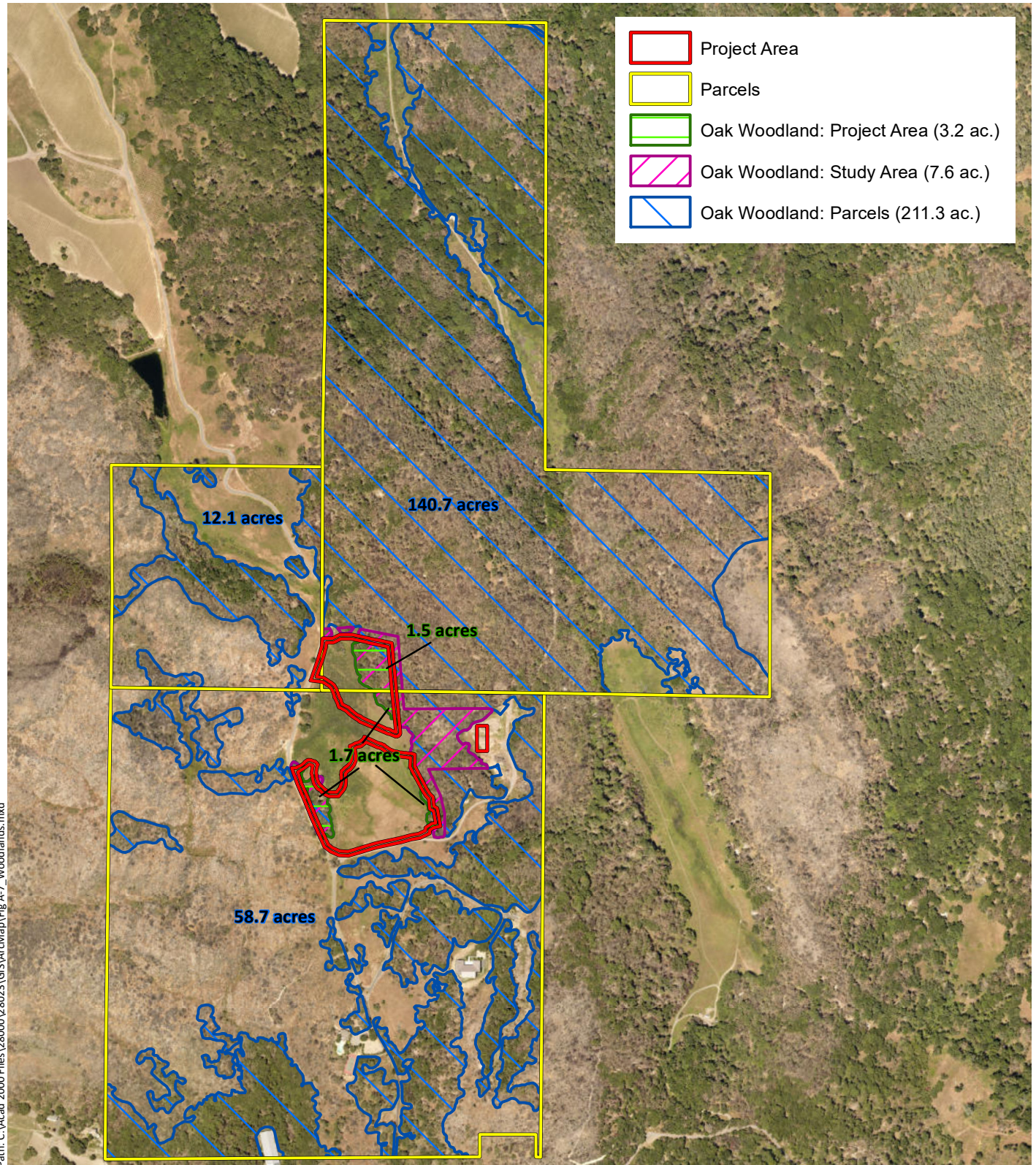


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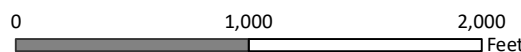
**Enclosures:** Attachment A – Figures  
Attachment B – Excerpt pages from County letter

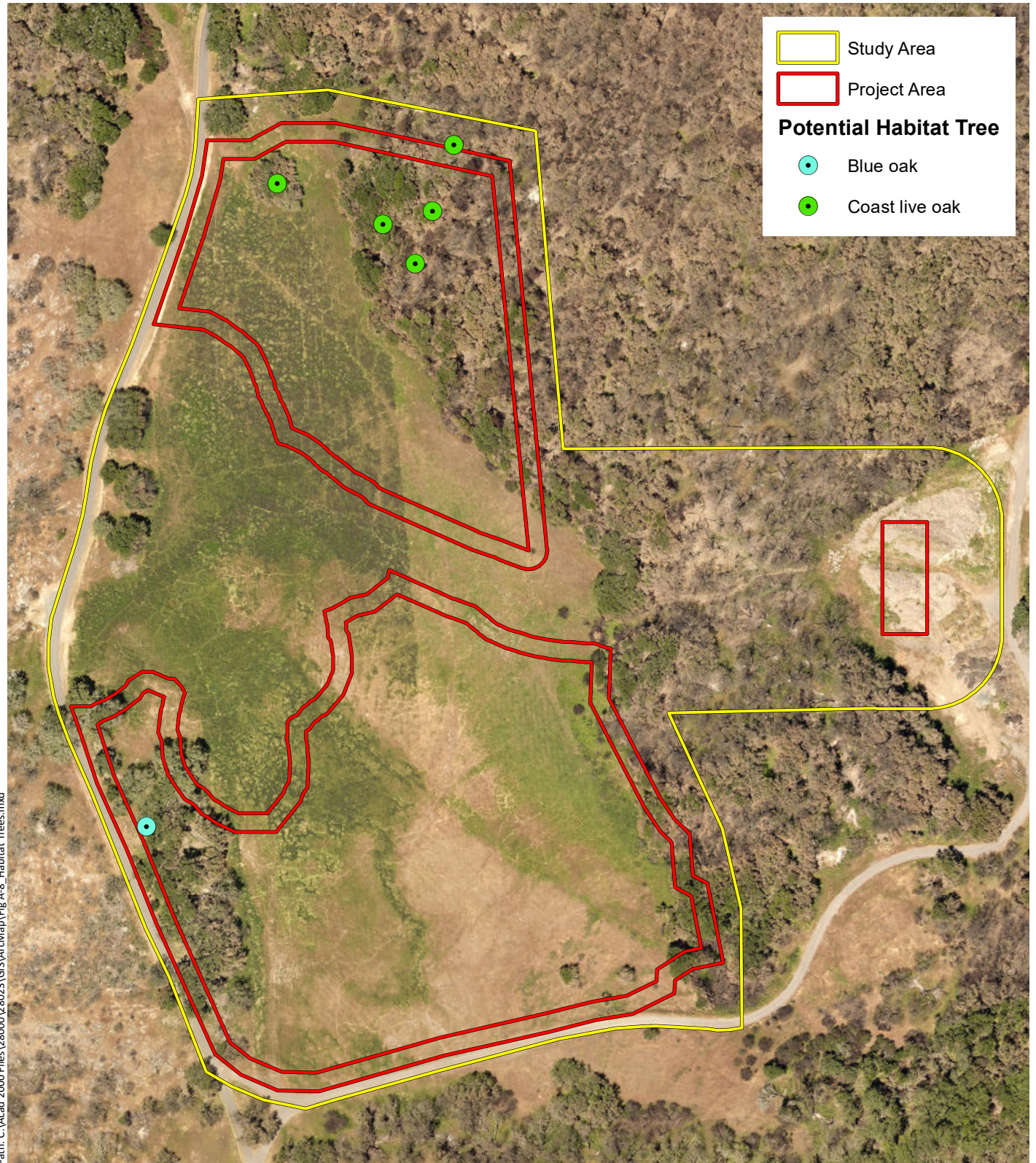


Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: aarthur, 7/3/2021

**Figure A-1. Oak Woodlands**

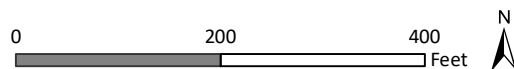
Kenzo Estate  
Wild Horse Valley Road  
Napa County, CA





**Figure A-2. Potential Habitat Trees**

Kenzo Estate  
Wild Horse Valley Road  
Napa County, CA



**EXHIBIT A**  
**APPLICATION COMPLETENESS DETERMINATION – INFORMATION REQUEST**  
**Kenzo Estate Vineyard Conversion #P21-00086-ECPA: 033-190-014, 033-190-015 & 033-130-046**

**1) Agricultural Erosion Control Plan Application Completeness Items:** This information is necessary to and to complete the ECPA application for continued review and processing, describe the full extent of the proposed project, and adequately disclose and assess potential impacts of the project pursuant to CEQA.

**a) Vegetation Canopy Cover in Sensitive Domestic Water Supply Drainage:**

- i. While it is evident that the proposed project would comply with the 70% canopy cover and 40% of the shrub, brush and associated annual and perennial herbaceous vegetation retention requirement based on 1993 configurations for projects within a sensitive domestic water supply drainage (pursuant to Napa County Code Section 18.108.027), it appears that the proposed project parcels are included on historic parcels 033-190-001, 033-130-001 and 033-130-003 (see enclosed archival Assessor's Parcel pages). Please revise the proposed conditions vs. 1993 conditions table and the combined parcels table and narrative accordingly.
- ii. Provide an exhibit based on the 2018 aerial (pursuant to NCC 8.80.130, attached) accompanied by a table indicating the amount of vegetation canopy cover on each of the three project parcels, the amount proposed for removal on each parcel, and the proposed 3:1 mitigation area pursuant to NCC 18.108.020(D) for each parcel.

**b) ECPA Plans and/or Narrative:** Please provide revised plans or narrative (or addendums thereto) that include, show and/or clarify the following:

- i. Sheet C3 shows slope transects that extend into in the wetland, outside of the project boundaries. Please revise transects A-A and D-D to include the project area only, and revise narrative and project details as appropriate.

**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 documentation that includes and/or expands on the following information so that the environmental setting and potential impacts of the proposed project can adequately be disclosed and assessed:

- i. Figure A-7 does not include APN 033-190-014 (refer to 1(a)(i), above). While it is understood that oak woodland is not proposed for removal on this parcel, the parcel is still subject to the vegetation retention requirements found in Napa County Code 18.108.027(B) and General Plan Policy CON-18, which require that projects in sensitive domestic water supply drainages maintain a minimum of 70% tree canopy cover and 40% of the shrub, brush and associated annual and perennial herbaceous vegetation on the project parcels as configured on June 16, 1993. Please revise aerial baseline and Section 6.1.1 regarding vegetation removal and retention accordingly.
- ii. Please provide details of oak woodland acreage and proposed removal on each parcel to evaluate the requirements for retention and mitigation pursuant to Conservation Regulations 18.108.020(D) and 18.108.027(B) for each parcel.
- iii. Provide additional information and details on any significant trees (i.e. Trees with Unique Wildlife Value such as bat habitat, etc.) within the project area and ecological benefits they may provide.

- b. Water Availability Analysis (WAA):** The WAA analysis is based on 10.5 acres of proposed vines. Please revise the analysis to be consistent with the proposed 11 net vine acres.

**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.