



March 25, 2008

Mr. Mike Kelley  
Panattoni Development Company  
8775 Folsom Blvd., Suite 200  
Sacramento, CA 95826

SUBJECT: Subject: Biological Mitigation Measures for Napa Airport Corporate Center Phase 1 Development,  
Napa County, CA.

Dear Mr. Kelley:

The purpose of this letter is to comment on Mitigation Measure IV.1 of the Initial Study/Mitigated Negative Declaration prepared by the County of Napa for the Napa Airport Corporate Center located on 12.44 acres of the 34.4 acre property surveyed by Jones & Stokes. The following biological reports have been prepared by Jones & Stokes in 2005 based on these surveys:

- Delineation of Wetlands and Other Waters of the United States for Panattoni Development Company's South Kelly Road Project Site (2005)
- Results of a Site Assessment and Protocol-Level Surveys for California Red-Legged Frog at the South Kelly Road Project Site (2005)

Additionally, Jones and Stokes is currently conducting protocol-level surveys for listed Branchiopod surveys (vernal pool fairy shrimp and vernal pool tadpole shrimp)\

To date, the wetland delineation has been verified by the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service has concurred that the California Red-Legged Frog does not occur onsite (Ryan Olah, USFWS, email dated May 31, 2006), and the surveys for listed branchiopods have been negative (the final results of the wet and dry season branchiopod surveys will be completed later this Spring).

Based on our knowledge of the property, we believe that mitigation measure IV.1 in combination with a stormwater pollution prevention plan prepared in accordance with the General Construction Permit from the RWQCB would be sufficient to protect the wetlands from indirect effects from the development. This determination is based on our understanding that the local topography of the site is such that water would not typically flow from the proposed construction area to the wetlands under normal conditions and protective fencing would ensure that construction equipment, trash, or generated sediments would not affect the wetlands.

Sincerely,

Michael Vondergeest  
Jones & Stokes, Project Manager