

Kelli Cahill, Project Planner  
Napa County Planning, Building, and Environmental Services Dept.  
1195 Third Street, Suite 210  
Napa, CA 94559

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Dear Ms. Cahill,

Thank you for this opportunity to comment on the Walt Ranch draft EIR. I have been able to examine the dEIR document and the Appendices and have the following comments:

- The mammal section of the dEIR and Appendices neglects many of the bat species that have a strong potential to occur in the project area. Many of these bat species are identified as sensitive species by the State of California. Of greatest concern is the Townsend's big-eared bat (*Corynorhinus townsendii*). This species is a candidate for listing as Threatened under the California Endangered Species Act and as a candidate, must be treated as a species listed as a Threatened species. The document does identify this species but indicates that they utilize caves and mines and therefore no mitigation is proposed. While *Corynorhinus* is most commonly known for occupying caves and mines, they are also found in buildings, hollows in large rock formations, as well as in some occasions in large hollows associated with trees. Therefore, these areas would also need to be surveyed to ascertain presence/absence of this species to remain in compliance with the California Endangered Species Act.
- The other sensitive bat species mentioned in the document is the pallid bat (*Antrozous pallidus*). This species is strongly correlated with oak woodlands and based on the habitat mapping and the habitat photographs, I would expect this species to occur in the project site. Many of the bat biologists in coastal areas and inland areas of California are in agreement that this species has been undergoing population declines over the past one or two decades. This species is known to day roost in rock formations, barns and other structures, and tree cavities. Surveys targeting this species should also be conducted.
- A number of other sensitive bat species are also likely to occur in the project area. These California Species of Special Concern include: Western mastiff bat (*Eumops perotis*) – a rare species that is often associated with rock formations; Western red bat (*Lasiurus blossevillii*) – a foliage-roosting species associated with riparian trees and oak woodlands; and, fringed myotis (*Myotis thysanodes*) – a species associated with rock crevices, tree cavities and exfoliating bark, buildings, and bridges. Several other species that are identified by the Western Bat Working Group (WBWG) as “High” or “Medium” sensitivity species or by Federal agencies as “Sensitive” species also could occur in the project area. These include silver haired bat (*Lasionycteris noctivagans*) – WBWG Medium sensitivity; hoary bat (*Lasiurus cinereus*) – WBWG Medium sensitivity; Western small-footed myotis (*Myotis ciliolabrum*) – WBWG Medium sensitivity, Bureau of Land Management and U.S. Forest Service Sensitive

species; and, long-eared myotis (*Myotis evotis*) – WBWG Medium sensitivity, Bureau of Land Management Sensitive species.

- Acoustic surveys for bats are a commonly used method to ascertain presence of bat species in an area. The acoustic sonograms are analyzed by a qualified bat biologist to develop a species list for the area. Surprisingly this was not utilized for the wildlife surveys conducted for the area and should be utilized as a means to help understand the bat fauna present at the project site. It should be noted that *Corynorhinus townsendii* is not a species that can be readily identified through acoustic surveys due to their very low intensity echolocation calls – thus severely reducing the effectiveness of acoustic equipment for identification of this species.
- An additional species that would need to be addressed in the document is the Ringtail (*Bassariscus astutus*), a California Fully Protected Mammal (California Fish and Game Code Section 4700). This species occupies oak woodlands, chaparral, forested habitats, riparian zones, and rock formations/outcrops. It is nearly always nocturnal and is rarely seen – even when present in an area. As a Fully Protected Mammal in California, this species would need to be addressed in the dEIR. Camera traps are an effective means to determine presence of Ringtails in an area. Track plates are another effective method. Scat can also be used to determine potential occupancy of an area, however, scats for ringtails can sometimes be difficult to detect.

Thank you again for this opportunity to review and comment on the dEIR for the Walt Ranch project. If you have any questions or need additional information, please feel free to contact me anytime at the below address, email, or phone number.

Yours truly,

*David T. Wyatt*

David T. Wyatt, Wildlife Biologist  
3500 Partridge Ave  
West Sacramento, CA 95691  
davidwyatt@mac.com  
916-617-2406