A Tradition of Stewardship
A Commitment to Service

Planning, Building & Environmental Services

1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org
(707) 253-4417

Brian D. Bordona
Director

TO: Application File #P23-00360-ECPA

FROM: Pamela Arifian, Planner III

DATE: December 18, 2025

RE: Response to Comments – Schramsberg Vineyards
Agricultural Erosion Control Plan (ECPA) File #P23-00360-ECPA
Assessor's Parcel Number APNs 020-300-014 and -015, 020-390-007, -008, -011 & -020
1400 Schramsberg Road, Calistoga
SCH #2025101322

INTRODUCTION

This memorandum has been prepared by the County Conservation Division to respond to comments received by the Napa County Department of Planning, Building and Environmental Services (Napa County) on the Proposed Initial Study/Mitigated Negative Declaration (Proposed IS/MND) for the Schramsberg Vineyards Agricultural Erosion Control Plan #P23-00360-ECPA (proposed project). An IS/MND is an informational document prepared by a Lead Agency, in this case, Napa County, that provides environmental analysis for public review. The agency decision-maker considers it before taking discretionary actions related to any proposed project that may have a significant effect on the environment. The Proposed IS/MND analyzed the impacts resulting from the proposed project and where applicable, identified mitigation measures to minimize the impacts to less-than-significant levels.

This memorandum for the Schramsberg Vineyards Agricultural Erosion Control Plan #P23-00360-ECPA Proposed IS/MND presents the name of the persons and/or organizations commenting on the Proposed IS/MND and responses to the received comments. This memorandum, in combination with the IS/MND, completes the Final IS/MND.

CEQA PROCESS

In accordance with Section 15073 of the CEQA *Guidelines*, Napa County submitted the Proposed IS/MND to the State Clearinghouse for a 30-day public review period starting October 30, 2025. In addition, Napa County circulated a Notice of Intent to Adopt the Proposed IS/MND to interested agencies and individuals. The public review period ended on December 1, 2025. During the public review period, Napa County received two (2) comment letters on the Proposed IS/MND. Table 1 below lists the entity that submitted comments on the Proposed IS/MND during the public review and comment period. The comment letters are attached as identified in Table 1.

TABLE 1
COMMENTS RECEIVED ON THE PROPOSED IS/MND

Comment No./ Attachment	Comments Received from	Date Received
1	Richard Svendsen	October 30, 2025
2	California Department of Fish & Wildlife (CDFW)	November 25, 2025

In accordance with CEQA *Guidelines* Section 15074(b), Napa County considers the Proposed IS/MND together with comments received, both during the public review prqocess and before action on the project, prior to adopting the Proposed IS/MND and rendering a decision the project. The CEQA *Guidelines* do not require the preparation of a response to comments for mitigated negative declarations; however, this memorandum responds to comments received. Based on review of the comments received, no new potentially significant impacts beyond those identified in the Proposed IS/MND would occur, no new or additional mitigation measures, or project revisions, must be added to reduce impacts to a less than significant level, and none of the grounds for recirculation of the Proposed IS/MND as specified in State CEQA *Guidelines* Section 15073.5 have been identified. All potential impacts identified in the Proposed IS/MND were determined to be less-than-significant or less-than-significant with mitigation incorporated.

Furthermore, this Response to Comments Memorandum will be provided to the owner/Permittee as **notice** of potential Local, State and Federal permits necessary to implement and operate this project as identified within the attached agency comment letters, and that project approval shall be subject to conditions of approval requiring any and all such permits be obtained prior to the commencement of vegetation removal and earth-disturbing activities (grading) associated with #P23-00360-ECPA.

RESPONSE TO COMMENTS

Comment #1 Richard Svendsen (Attachment 1)

Response to Comment 1.1:

The commenter's opposition to the project is noted. No new or additional evidence has been provided that demonstrates the potential level of impacts analyzed as a result of the proposed project would occur beyond what is identified in the Proposed IS/MND or that additional mitigation is necessary; as such, no further action is required.

Comment #2 California Department of Fish and Wildlife (Attachment 2)

Response to Comment 2.1:

CDFW asserts that the Proposed IS/MND does not adequately evaluate potential impacts to Clara Hunt's milk-vetch (*Astragalus claranus*), a State and federally listed endangered species, despite it being listed in the Biological Resource Survey Attachment 2 (Exhibit B-1 of the Proposed IS/MND) as having a high probability of being found on the site. The letter asserts that neither the Proposed IS/MND nor the Biological Resource Survey includes further investigation into the potential for the Clara Hunt's milk-vetch to be impacted by the project; as such it is unclear whether the surveys conducted in 2022 were adequate and appropriately timed to detect the species.

The Biological Resources Survey (**Exhibit B of the Proposed IS/MND**) was prepared in compliance with Napa County's guidelines for preparation of biological resources reconnaissance surveys. As stated in the Biological Resource Survey, protocol-level floristic surveys (CNPS 2021, CDFW 2018) were performed by Heather Morrison, a Certified Consulting Botanist with over 15 years of experience in Napa County, as well as neighboring Sonoma and Lake Counties.

As stated on page 21 of the Biological Resource Survey, the potential for each special status species to occur was ranked based on criteria focused on existence and quality of habitat components and suitability of the species on and adjacent to the site. Reference populations of target plant species with a moderate or high potential to occur in the project area were visited to the extent feasible to ensure that the surveying botanist had an accurate search image for a species, and/or to determine whether the species was blooming at the expected time. The protocol-level floristic surveys corresponded to the period sufficient to observe and identify those special status plants determined to have the potential to occur; however, all plants observed were identified and recorded (**Exhibit B-1** of the Proposed IS/MND).

In a letter dated December 1, 2025 in response to the CDFW comments on the Proposed IS/MND, the project biologist (Heather Morrison, Salix Natural Resources Management, Inc.; Attachment 3 to this Responses to Comments document) stated that while it was not feasible for the biologist to view Clara Hunt's milk-vetch at known nearby sites, she is familiar with the plant and has observed it in its natural habitat in Napa County, including when it was in bloom and not in bloom. The plant blooms from March through May and is vegetatively present in the months after May until it senesces later in the hotter months. The biologist notes that milk-vetch (*Astragalus* spp.) plants can be identified by their vegetation without blooms, and that the survey visits were conducted during the species' well-published bloom windows (surveys on April 4, April 11, and April 16) and after its bloom window (June 21 and 22). The

biologist states that, had a non-blooming *Astragalus* been located within Blocks 2, 3 and 4 (the only areas of the project with potential habitat), subsequent and rigorous efforts would have been made to formally identify the plant(s) and it would have been addressed in the report.

Given the biologist's stated familiarity with Clara Hunt's milk-vetch during in bloom and post—bloom stages, and that the floristic surveys were performed according to protocol set forth by the California Native Plant Society and CDFW, the County appropriately considers the potential impacts on special-status plants to remain less than significant following implementation of Mitigation Measure BIO-1, as analyzed and disclosed in the Proposed IS/MND and Exhibits, without need for further mitigation.

Response to Comment 2.2:

The CDFW recommendation to submit to the California Natural Diversity Database reports of any positive results of special status species and natural communities from project surveys shall be included as a condition of approval, should the project be approved:

> **Condition of Approval – Wildlife Survey Reporting Condition:** The Owner/Permittee shall submit to the California Natural Diversity Database all reports of special-status species and natural communities detected during project surveys using the online CNDDB field survey form.

Response to Comment 2.3: The CDFW Environmental Filing Fee for a Mitigated Negative Declaration will be paid upon filing of the CEQA Notice of Determination for this project, if approved.

List of Attachments

Attachment 1 – Email from Richard Svendsen dated October 30, 2025.
Attachment 2 – California Department of Fish and Wildlife letter dated November 25, 2025.
Attachment 3 – Letter from project biologist Heather Morrison, Salix Natural Resource Management, Inc., dated December 1, 2025.

01 SVENDSEN

From: MeetingClerk
To: Arifian, Pamela
Subject: FW: Napa County Notice of Intent to Adopt a Mitigated Negative Declaration
Date: Thursday, October 30, 2025 11:18:51 AM
Attachments: image001.png

See email below.

Kind Regards,

Napa County – Meeting Clerk - AV
Planning, Building, & Environmental Services
Napa County
Phone: 707-253-4417
Email: meetingclerk@countyofnapa.org
1195 Third Street, Suite 210
Napa, CA 94559
www.napacounty.gov

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From: RICHARD W SVENDSEN <rsvendsen@sbcglobal.net>
Sent: Thursday, October 30, 2025 11:17 AM
To: MeetingClerk <MeetingClerk@countyofnapa.org>
Subject: Re: Napa County Notice of Intent to Adopt a Mitigated Negative Declaration

[External Email - Use Caution]

Absolutely not. This our watershed
Sent from my iPhone

> On Oct 30, 2025, at 9:07 AM, MeetingClerk <MeetingClerk@countyofnapa.org> wrote:
>
> *SCHRAMSBERG VINEYARDS AGRICULTURAL EROSION CONTROL PLAN*
> *P23-00360-ECPA- ENVIRONMENTAL REVIEW*

<P23-00360-ECPA Notice of Intent.pdf>

Docusign Envelope ID: 42FC9C32-5A4B-43D8-BDA2-7AAD86C543C9

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

02 CDFW

November 25, 2025

Pamela Arifian
Napa County
1135 Third Street Suite 210
Napa, CA 94559
Pamela.Arifian@countyofnapa.org

Subject: Schramsberg Vineyards Agricultural Erosion Control Plan #P23-00360-ECPA, Initial Study/Mitigated Negative Declaration, SCH No. 2025101322, Napa County

Dear Mr. Arifian:

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration (IS/MND) from Napa County (County) for the Schramsberg Vineyards Agricultural Erosion Control Plan (ECPA) #P23-00360-ECPA (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

After receiving a one-week extension from the County, CDFW is submitting comments on the IS/MND to inform the County as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Hugh Davies, Property Co-owner

Objective: The Project would include the clearing of vegetation, earthmoving, and installation and maintenance of erosion control measures associated with the development of approximately 14.1 gross acres of vineyard with approximately 11.0 net planted acres (including 1.2 acres of existing vineyard installed without benefit of a permit) in seven vineyard blocks, located on four separate parcels under same ownership and totaling 162.56 acres (i.e., Project site), including areas that were burned in the 2020 Glass Fire. The Project would result in the conversion to vineyard of

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approximately 12.9 acres of pre-fire tree canopy, including 11.4 acres of Douglas fir forest and 1.5-acre of coast live oak woodland (163 trees greater than 6-inch diameter at breast height [DBH]). The Project would preserve 39.4 acres of vegetation canopy cover, including 6.9 acres of pre-fire oak woodland and 32.5 acres of pre-fire coniferous forest. All temporary debris, vegetation, soil and soil amendment stockpiles and storage areas, if needed, will be located within the proposed vineyard Project site. No long-term stockpiles of rock or soil are anticipated. No new roads are required to access the Project site. Access is via the existing driveways and access roads. Access to a majority of the Project site is via a paved private road (Schramsberg Road) off State Route 29 and existing gravel and dirt vineyard access roads that serve the existing winery, vineyard and residential uses. All irrigation water for the existing and proposed vineyard would be supplied by existing developed groundwater resources. No other new wells or other water sources are planned as part of the Project. Irrigation pipelines would be located in existing roads, vineyards and vineyard avenues, and within the Project site.

Location: The Project is located at 1400 Schramsberg Road, Calistoga, CA 94515; Assessor Parcel Numbers 020-300-014 and -015, and 020-390-007, -008, -011 & -020; with a Project site center at approximately Latitude 38.55135, Longitude -122.53942; Napa County.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. **The Project has the potential to impact Clara Hunt's milk-vetch (*Astragalus claranus*), state listed as endangered, as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

COMMENTS AND RECOMMENDATIONS

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CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below and included in **Attachment 1** Draft Mitigation Monitoring and Reporting Program, CDFW concludes that an MND is appropriate for the Project.

I. MANDATORY FINDING OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

And,

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

COMMENT 1: Clara Hunt's Milk-vetch and other Special-Status Plants, Environmental Setting and Related Impact Shortcoming

Issue: The IS/MND does not adequately evaluate potential impacts to Clara Hunt's milk-vetch, despite the Biological Resource Reconnaissance Survey (IS/MND Exhibit B-1, Attachment 2) indicating a high likelihood of potential habitat occurring on the Project site. According to pages 21 and 22 of the Exhibit B-1, a rating of "high" means "All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site." However, neither the IS/MND nor exhibits include further investigation into the potential for Clara Hunt's milk-vetch to be impacted by the Project. For example, it appears that the plant survey did not include reference site visits for Clara Hunt's milkvetch, based on the species' absence from page 21 of Exhibit B-1 which lists plant species for which the Project conducted reference site visits. Therefore, it is unclear whether the plant surveys conducted in 2022 at the Project site were adequate and appropriately timed to detect Clara Hunt's milk-vetch. 2.1

It is also unclear why the target special-status plant species list was narrowed from 28 to 10 species (see page 27 of Exhibit B-1), as it was determined that 28 special-status plant species have a high potential to occur. Exhibit B-1 indicates this is due to only 10 of the species previously documented within the Biological Resources Evaluation Area, however lack of documentation in the Project area does not necessarily indicate that the remaining 18 species do not have a high potential to occur. The target list should also include special-status plant species with a *moderate* potential to occur. Therefore, it is unclear whether the plant surveys conducted in 2022 at the Project site were adequate

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and appropriately timed to detect all special-status plant species determined to have a moderate or high potential to occur.

Specific impacts and why they may occur and be significant: Clara Hunt's milk-vetch is state and federally listed as endangered, and therefore is considered to be an endangered species pursuant to CEQA Guidelines section 15380. If Clara Hunt's milk-vetch is present on or adjacent to the Project site, the Project could damage or remove individuals on-site or adjacent to it through direct or indirect impacts, resulting in a substantial reduction in the number of an endangered species, which is considered a *Mandatory Finding of Significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Additionally, if other special-status plant species that were determined to have a moderate or high potential to occur, but were not considered target species during 2022 plant surveys, are present on or adjacent to the Project site, the Project could damage or remove individuals on-site or adjacent to it through direct or indirect impacts, resulting in *potentially significant impacts*.

Recommended Mitigation Measure: To reduce impacts to Clara Hunt's milk-vetch and other special-status plants to less-than-significant and comply with CESA, CDFW recommends including the below mitigation measure in the IS/MND. 2.1

Mitigation Measure BIO-9: Special-Status Plant Surveys. A qualified biologist shall conduct botanical surveys during the appropriate blooming period/when the species is identifiable and conditions for Clara Hunt's milk-vetch and other special-status plant species determined to have a high or moderate potential to occur but not considered target species during year 2022 plant surveys, unless otherwise approved in writing by CDFW. The survey area shall cover the Project site and adjacent areas where the above species could be directly or indirectly impacted, and the survey shall occur prior to the start of Project construction including, but not limited to ground disturbance, tree removal, and vineyard development, unless otherwise approved in writing by CDFW. Surveys shall be conducted following CDFW's Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and include checking reference sites for Clara Hunt's milk-vetch and other target special-status plant species, unless otherwise approved in writing by CDFW. More than one year of surveys may be necessary according to the above protocol survey methodology. The survey report(s) shall be submitted to CDFW and the Project shall obtain CDFW's written approval of them prior to Project construction. If full avoidance of a State listed species such as Clara Hunt's milk-vetch is not possible, the Project shall consult with CDFW and obtain a CESA ITP prior to Project construction, and shall comply with the ITP. The Project shall also consult with USFWS for potential impacts to federally listed plant species. If full avoidance of other special-status (non-CESA listed) plant species is not possible, the Project shall submit a mitigation plan (plan) to CDFW and obtain CDFW's

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written approval of the plan prior to Project construction, and the plan shall include but not be limited to transplanting, seed collection and broadcasting, habitat enhancement, and/or habitat compensation at a minimum 3:1 mitigation to impact ratio including a conservation easement and long term funding and implementation of a management plan, appropriate to the species. 2.1

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 2.2

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 2.3

CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nicholas Magnuson, Environmental Scientist, at (707) 815-4166 or Nicholas.Magnuson@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

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Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Land Use and Climate Innovation (SCH No.2025101322)

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ATTACHMENT 1

Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)			
Mitigation Measure	**Description**	**Timing**	**Responsible Party**
BIO-9	Special-Status Plant Surveys. A qualified biologist shall conduct botanical surveys during the appropriate blooming period/when the species is identifiable and conditions for Clara Hunt's milk-vetch and other special-status plant species determined to have a high or moderate potential to occur but not considered target species during year 2022 plant surveys, unless otherwise approved in writing by CDFW. The survey area shall cover the Project site and adjacent areas where the above species could be directly or indirectly impacted, and the survey shall occur prior to the start of Project construction including, but not limited to ground disturbance, tree removal, and vineyard development, unless otherwise approved in writing by CDFW. Surveys shall be conducted following CDFW's Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and include checking reference sites for Clara Hunt's milk-vetch and other target special-status plant species, unless otherwise approved in writing by CDFW. More than one year of surveys may be necessary according to the above protocol survey methodology. The survey report(s) shall be submitted to CDFW and the Project shall obtain CDFW's written approval of them prior to Project construction. If full avoidance of a State listed species such as Clara Hunt's milk-vetch is not possible, the Project shall consult with CDFW and obtain a CESA ITP prior to Project construction, and shall comply with the ITP. The Project shall also consult with USFWS for potential impacts to federally listed plant species. If full avoidance of other special-status (non-CESA listed) plant species is not possible, the Project shall submit a mitigation plan (plan) to CDFW and obtain CDFW's written approval of the plan prior to Project construction, and the plan shall include but not be limited to transplanting, seed collection and broadcasting, habitat	Prior to Ground Disturbance	Project Applicant

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	enhancement, and/or habitat compensation at a minimum 3:1 mitigation to impact ratio including a conservation easement and long term funding and implementation of a management plan, appropriate to the species.		

Attachment 3

Salix Natural Resource Management, Inc.
P.O. Box 684
Ukiah, CA 95482

December 1, 2025

Pamela Arifian
Napa County
1135 Third Street Suite 210
Napa, CA 94559

Re: Schramsberg Vineyards Agricultural Erosion Control Plan #P23-00360-ECPA, Initial Study/Mitigated Negative Declaration, SCH No. 2025101322, Napa County

Dear Ms Arifian,

This letter provides a response to a letter dated 11-25-2028 from the California Department of Fish and Wildlife (CDFW), concerning the botanical assessment for the above project. My hope is to provide further information to support the finding that Clara Hunt's milkvetch was not found within the project area and that the botanical assessment was thorough. Therefore, there is no 'substantial revision' of the IS/MND. The following claims were made by CDFW (*italics*) and my response is as follows:

1) *The IS/MND does not adequately evaluate potential impacts to Clara Hunt's milk-vetch, despite the Biological Resource Reconnaissance Survey (IS/MND Exhibit B-1, Attachment 2) indicating a high likelihood of potential habitat occurring on the Project site. According to pages 21 and 22 of the Exhibit B-1, a rating of "high" means "All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site." However, neither the IS/MND nor exhibits include further investigation into the potential for Clara Hunt's milk-vetch to be impacted by the Project. For example, it appears that the plant survey did not include reference site visits for Clara Hunt's milkvetch, based on the species' absence from page 21 of Exhibit B-1 which lists plant species for which the Project conducted reference site visits. Therefore, it is unclear whether the plant surveys conducted in 2022 at the Project site were adequate and appropriately timed to detect Clara Hunt's milk-vetch.*

   Because a sensitive plant is not located in an area of highly suitable habitat does not mean the assessment is inadequate. It merely means that the plant is not there. With regards to the reference sites, as mentioned in the report (Exhibit B-1, page 21), where feasible, these will be visited to gain an accurate image of the species and to determine whether plants are blooming. In 2022, it was not feasible for me to view Clara Hunt's milkvetch at known, nearby sites. However, I am familiar with this plant having seen it in its natural habitat within Napa

County. I know what it looks like in bloom and not in bloom. It is important to note that blooming only helps with identification and is helpful in the field to catch your eye, but milkvetch (*Astragalus* spp.) plants can vegetatively be identified without blooms, so for this species survey timing is not critical. I did make multiple visits to the area in question during its well-published bloom windows on April 4, April 11, April 16 and after its bloom window on June 21 and 22, 2022. Had a non-blooming Astragalus (milkvetch) been located within Units 2, 3 and 4 (the only units with potential habitat), subsequent and rigorous efforts would have been made to formally identify the plant(s), and it would have been addressed in the report. This plant blooms from March through May and is vegetatively present in the months after May until it senesces later in the hotter months.

2) *It is also unclear why the target special-status plant species list was narrowed from 28 to 10 species (see page 27 of Exhibit B-1), as it was determined that 28 special-status plant species have a high potential to occur. Exhibit B-1 indicates this is due to only 10 of the species previously documented within the Biological Resources Evaluation Area, however lack of documentation in the Project area does not necessarily indicate that the remaining 18 species do not have a high potential to occur. The target list should also include special-status plant species with a moderate potential to occur. Therefore, it is unclear whether the plant surveys conducted in 2022 and appropriately timed to detect all special-status plant species determined to have a moderate or high potential to occur.*

   All plants on the scoping list on Exhibit B-1, Attachment 2 were targeted. A 9-quadrangle scoping list contains all species (all habitats) that have been found within the CNNDB and CNPS inventories within the project area quadrangle map, along with the eight (8) surrounding quadrangle maps. The BREA is the Napa County assessment area which is a smaller area. The "28 to 10" is in reference to the "28" plants on the 9-quadrangle scoping list, and the "10" plants that were recorded as being present in the BREA (a smaller area). This does not mean that only those 10 were targeted. Quite the opposite is true because a floristic survey was conducted, meaning that all plants encountered during the surveys were identified to the species level (Exhibit B-1, Attachment 3). Floristic surveys are important because rare plants can sometimes be discovered as outliers and could be missed if only a focused survey was being conducted. For example, in 2025, I conducted a botanical survey for a different project, and discovered a rare sedge that was not on the 9-quadrangle scoping list, as it had never been found or recorded within that 9-quadrangle area. Because a floristic survey was done, this plant was identified along with everything else I encountered. So, to clarify, all species on the scoping list are sought, and all species encountered are recorded, and unknown or unidentifiable plants are brought home to key out in the Jepson Manual.

3) *Additionally, if other special-status plant species that were determined to have a moderate or high potential to occur, but were not considered target species during 2022 plant surveys, are present on or adjacent to the Project site, the Project could damage or remove individuals on-site or adjacent to it through direct or indirect impacts, resulting in potentially significant impacts.*

   A floristic survey was conducted by visiting the sites several times in April and once in June, covering all bloom windows for all moderate and high potential plants on the 9-quadrangle scoping list.

Sincerely,

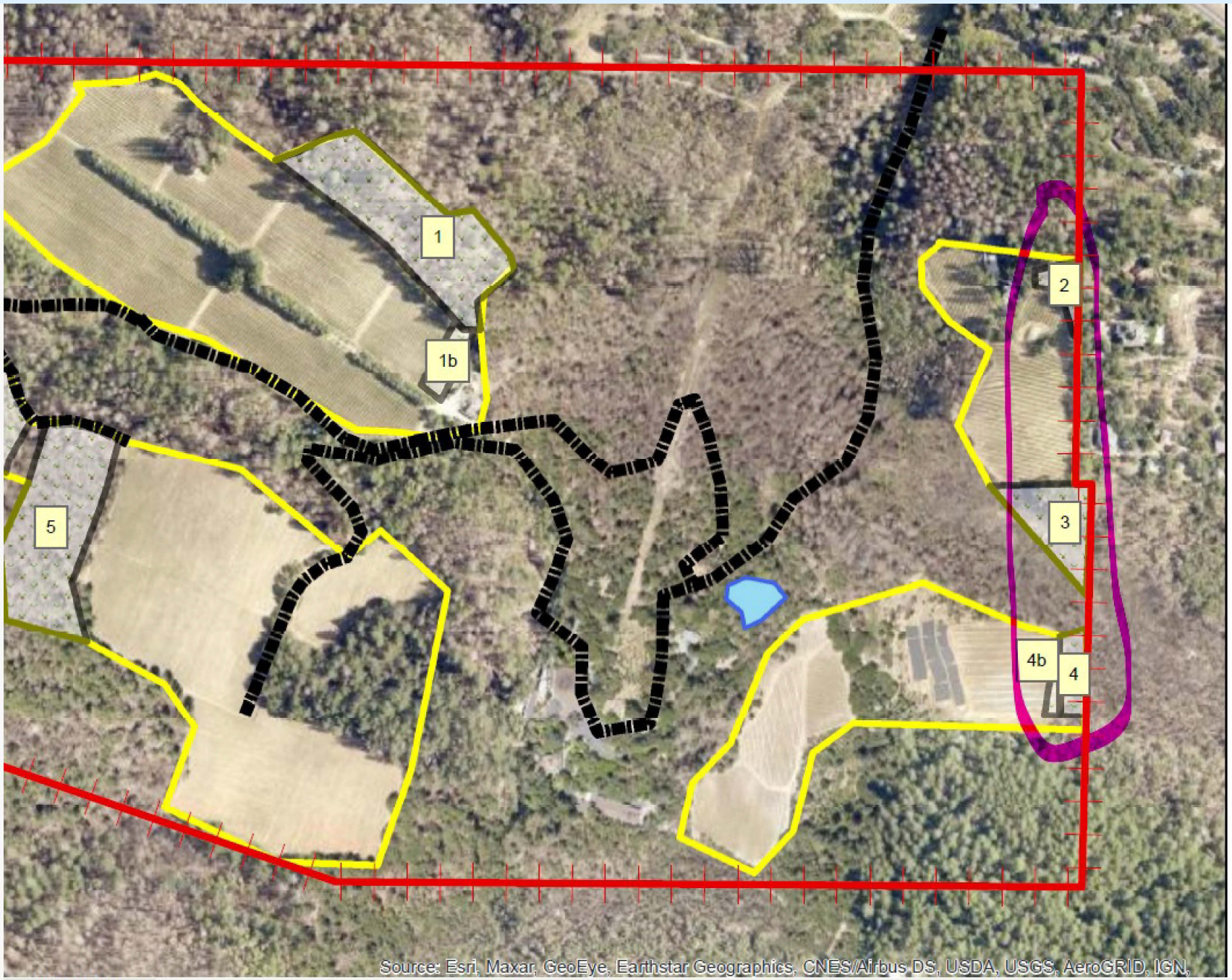
Heather Morrison



Certified Botanist #31

P.O. Box 684 • Ukiah, CA 95482 • (530) 913-0490 • heatherkamille@comcast.net

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Schramsberg Complete ...
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E-Sign
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