



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



December 19, 2025

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

Subject: 230 Long Ranch Road LLC Vineyard Development Agricultural Erosion
Control Plan #P24-00114-ECPA, Initial Study/Mitigated Negative Declaration,
State Clearinghouse No. 2025110958, Napa County

Dear Pamela Arifian:

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration (IS/MND) from Napa County (County) for the 230 Long Ranch Road LLC Vineyard Development Agricultural Erosion Control Plan (ECPA) #P24-00114-ECPA (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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) or Native Plant Protection Act (NPPA), the Lake or 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: 230 Long Ranch Road LLC

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 2 of 8

Objective: The Project would include the clearing of vegetation, earthmoving, and installation and maintenance of erosion control measures associated with the development of approximately 18.8 gross acres of vineyard with approximately 15.8 net planted acres in four vineyard blocks, located on a 48.42-acre parcel (Project site). The Project would convert to vineyard approximately 10.53 acres of chaparral habitat, which includes 6.4 acres of chamise and 4.13 acres of scrub interior live oak - scrub oak. The Project would preserve a minimum of 14.1 acres on-site that includes chamise alliance and scrub interior live oak-scrub oak habitat containing special-status plant populations within Block 4. The Project has been designed to avoid impacts to streams on-site.

Location: The Project is located at 230 Long Ranch Road, St. Helena, CA 94574, CA; Assessor Parcel Number 032-560-027; with the vineyard development area center at approximately Latitude 38.46615, Longitude -122.34475; 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*), CESA 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

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

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 3 of 8

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: Regarding Clara Hunt's milk-vetch, Exhibit B-1 states that "...the Study Area lacks suitable habitat to support this species, elevation out of range", and the species "...grows at elevations from 75 to 275 meters..." While this is generally consistent with species information provided by the Jepson Herbarium and California Native Plant Society, the species does not appear to strictly follow this elevation range in Napa County. For example, in 2019, a population of Clara Hunt's milk-vetch was submitted to the California Natural Diversity Database (CNDDDB) (Element Code PDFAB0F240) at an elevation of 1,165 feet (355 meters), approximately 16 miles northeast of the Project site; this elevation is within the elevation range of the Project site of 1,122 to 1,352 feet (342 meters and 412 meters) as described in Exhibit B-1. Based on other habitat requirements of Clara Hunt's milk-vetch described in Exhibit B-1, the Project site appears to be suitable for Clara Hunt's milk-vetch and includes chaparral vegetation communities and rocky soils derived from volcanic parent materials. Therefore, CDFW concludes that Clara Hunt's milk-vetch may occur on or adjacent to the Project site where it could be directly or indirectly impacted by the Project.

Additionally, plant surveys conducted on the Project site in 2023 may not have detected Clara Hunt's milk-vetch or other special-status species plants. According to the IS/MND, the Project "...conducted protocol level special-status plant surveys on the subject parcel...on April 12 and June 13, 2023" (page 14), and "Botanical assessments followed protocols described in the *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), *Botanical Survey Guidelines of the California Native Plant Society* (CNPS, 2001), *Guidelines for Mapping Rare Vegetation* (CNPS 2011), and *The Jepson Manual* (Baldwin, 2012)" (page 15). However, neither the IS/MND

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 4 of 8

nor the exhibit indicate whether the Project conducted reference population site visits for special-status plant populations including Clara Hunt's milk-vetch. Reference site visits are included on page 6 of the above mentioned 2018 CDFW survey protocol and are often needed to accurately time surveys for regional blooming periods, particularly for annual plant species such as Clara Hunt's milk-vetch.

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 and habitat on-site or adjacent to it through direct or indirect impacts, resulting in a substantial reduction in the number or restriction of the range of an endangered species, which is considered a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1). The Project could also damage or remove individuals or habitats of other special-status plant species 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.

Mitigation Measure BIO-4: Special-Status Plant Surveys. A qualified biologist shall conduct botanical surveys during the appropriate blooming period (or when the species is identifiable) and conditions for Clara Hunt's milk-vetch and other special-status plant species with suitable habitat on-site, unless otherwise approved in writing by CDFW. If the Project believes additional plant surveys are unnecessary, the Project may submit biologically based rationale to CDFW and shall obtain CDFW's written approval of the rationale prior to Project construction.

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

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 5 of 8

include the information outlined in the above survey protocol reporting section and 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 including but not limited to habitat compensation requirements. 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 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, unless otherwise approved in writing by CDFW.

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 CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>

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).

CONCLUSION

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

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 6 of 8

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:

B77F9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Planning and Research, State Clearinghouse No. 2025110958

Pamela Atifian, Planner III
 Napa County
 December 19, 2025
 Page 7 of 8

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-4	<u>Special-Status Plant Surveys.</u> A qualified biologist shall conduct botanical surveys during the appropriate blooming period (or when the species is identifiable) and conditions for Clara Hunt's milk-vetch and other special-status plant species with suitable habitat on-site, unless otherwise approved in writing by CDFW. If the Project believes additional plant surveys are unnecessary, the Project may submit biologically based rationale to CDFW and shall obtain CDFW's written approval of the rationale prior to Project construction. 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 include the information outlined in the above survey protocol reporting section and 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	Prior to Ground Disturbance	Project Applicant

Pamela Atifian, Planner III
Napa County
December 19, 2025
Page 8 of 8

	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 including but not limited to habitat compensation requirements. 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 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, unless otherwise approved in writing by CDFW.		
--	--	--	--