



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 22, 2024

Dana Morrison
Napa County
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Dana.Morrison@countyofnapa.org

Subject: Napa Valley Vine Trail Yountville through St. Helena, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2024070955, Napa County

Dear Ms. Morrison:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Napa Valley Vine Trail Yountville through St. Helena project (Project).

CDFW is providing Napa County (County), as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the draft EIR (See Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA), Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

PROJECT DESCRIPTION AND LOCATION

The Project site is approximately 11 miles long, extending north from the Town of Yountville at the intersection of California Drive and State Route (SR) 29 (38.39744° N, -122.35942°W), through the City of St. Helena to the previously constructed section of the Vine Trail at the intersection of Pratt Avenue and SR 29 (38.50963° N, -122.47787°W), in Napa County. The Project is one segment of the Napa Valley Vine Trail, a mostly Class I multiuse trail for pedestrians and cyclists that will run the length of the Napa Valley (Calistoga to American Canyon) and connect to the Vallejo Ferry

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Terminal in the City of Vallejo, Solano County, California. The Napa Valley Vine Trail – Yountville through St. Helena Section, the Project, would close the largest remaining gap in the Napa Valley Vine Trail. The Project is located within a combination of California Department of Transportation (Caltrans), public, and private right of way (ROW). Approximately 40 percent of the Project alignment is located within the Caltrans ROW. The County would also need to obtain private property easements to construct the proposed trail section. The Project will generally be paved 10-foot-wide trail with 2-foot rock shoulders for a total width of 14 feet in most locations, narrowing in constrained locations. Short retaining walls may be necessary to support the construction of the trail. The retaining walls could include mechanically stabilized earth, concrete barrier, or block walls and would generally be less than four feet tall. Additionally, the Project would install guardrails and construct concrete barriers between SR 29 and the trail in select locations where the trail is in the CRZ or shoulder of SR 29.

The Project would require water crossings, including 1) a new single span, pre-fabricated steel truss bridge at the crossing of Bale Slough / Bear Creek on railroad and private ROW near SR 29 PM 25.3, 2) a new culvert south of an existing private driveway near SR 29 PM 23.6, 3) a culvert extension at Kalon Creek on railroad ROW near SR 29 PM 22.3, and 4) a culvert extension or pre-fabricated pedestrian bridge at Lincoln Creek on railroad or private ROW near SR 29 PM 21.7. Additional water crossings would construct or extend culverts. The Project would require the installation of new culverts or culvert extensions throughout the alignment. The type, size and material of culvert extensions and new culverts would be designed to match existing conditions. Some existing culverts would be extended by up to 400 linear feet. In some constrained locations, new culverts would be installed in existing roadside ditches to minimize tree removal and ROW acquisition. These new culverts would extend between 50 to 500 linear feet. New or replacement headwalls and wingwalls would be installed or extended at some culvert crossings where necessary to provide enough width for the trail.

Vegetation and tree removal would be required to construct the trail and would include the removal of native trees, landscape trees, and non-native trees. It is estimated that approximately 95 trees would be removed by the Project.

The CEQA Guidelines (See Cal. Code Regs., tit. 14, § 15000 et seq.) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Land use changes resulting from, for example, rezoning certain areas;
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes;

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- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems;
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features; and
- Construction schedule, activities, equipment, and crew sizes.

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 California freshwater shrimp (*Syncaris pacifica*) and Sebastopol meadowfoam (*Limnanthes vinculans*), which are both CESA listed as endangered species, as further described below.** Issuance of a CESA 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 a CESA 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, and 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.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et. seq., is required for project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to LSA notification requirements. **The Project has the potential to impact several streams including, but not limited to, Bale Slough / Bear Creek, Kalon Creek, and Lincoln Creek.** CDFW, as a

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Responsible Agency under CEQA, would consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Nesting Birds

CDFW also has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, their eggs, and nests. Migratory birds are also protected under the federal Migratory Bird Treaty Act (MBTA).

California Fully Protected Species

California fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code § 2081.15). Project proponents should consult with CDFW early in the project planning process. **The Project has the potential to impact white-tailed kite (*Elanus leucurus*), a fully protected species.**

ENVIRONMENTAL SETTING

The draft EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including, but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities

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see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species and sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include but are not limited to those listed in **Attachment 1, such as those mentioned above and northwestern pond turtle (*Actinemys marmorata*), foothill yellow-legged frog (*Rana boylei* pop. 1), and Central California coast steelhead (*Oncorhynchus mykiss irideus* pop. 8).**

Habitat descriptions and the potential for species occurrence should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System, California Aquatic Resources Inventory (CARI), and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Based on the data and information from the habitat assessment, the draft EIR should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted during the blooming period within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations. More than one year of surveys may be necessary based on environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to special-status plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The draft EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Encroachments into riparian habitats, wetlands or other sensitive areas;

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- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The CEQA document should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to the impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g., reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the lead agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the draft EIR, and/or mitigate significant impacts of the Project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

CDFW offers the specific 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. Please be advised that the draft EIR should include a comprehensive evaluation of potentially significant impacts to fish and wildlife resources as described in this letter, and CDFW may provide additional comments once the draft EIR is circulated for public review.

COMMENT 1: To reduce impacts to streams to less-than-significant and comply with Fish and Game Code section 1600 et. seq., the Clean Water Act, and the Porter Cologne Water Quality Control Act, CDFW recommends including the below mitigation

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measure in the draft EIR. Note that the NOP mentions four “jurisdictional” water crossings and additional culvert work. Please be advised that the below measure may apply to all water crossings and culvert work, and not be limited to those the NOP identifies as “jurisdictional.”

Streambed Alteration: If the bed, bank, channel, or riparian habitat of any streams, including, but not limited to, ephemeral streams, will be impacted, the Project shall submit an LSA Notification to CDFW and comply with the LSA Agreement, if issued (See: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>). The Project shall also obtain any necessary authorization from the U.S. Army Corps of Engineer and Regional Water Quality Control Board pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.

COMMENT 2: To reduce impacts to California freshwater shrimp to less-than-significant and comply with CESA, CDFW recommends including the below mitigation measure in the draft EIR.

No-Disturbance of California Freshwater Shrimp Habitat. No streambanks outside of the Project footprint shall be impacted or disturbed. No sediment from the Project area shall be allowed to enter the stream channel. Flowing water and standing pools of water shall be completely avoided. Silt fencing and any other necessary erosion controls shall be installed between the work area and the stream channel to ensure sediment is prevented from entering the stream, unless otherwise approved in writing by CDFW. Photo documentation of the installed silt fence and erosion controls shall be submitted to CDFW on the day of installation and on a weekly basis thereafter until they are removed at the conclusion of Project activities. The silt fence shall be checked daily by the qualified biologist or a qualified individual approved in writing by CDFW, including during periods of inactivity, and any necessary repairs shall be made immediately. If sediment or any other materials from the Project area enter the stream channel Project activities shall immediately stop and the Project notify CDFW. If impacts to California freshwater shrimp cannot be avoided, the Project shall obtain a CESA ITP from CDFW before proceeding with the Project.

COMMENT 3: To reduce impacts to special-status plants such as Sebastopol meadowfoam and comply with CESA, CDFW recommends including the below mitigation measure in the draft EIR.

Pre-Project Special-Status Plant Habitat Assessment and Surveys. A qualified biologist shall conduct a habitat assessment to determine if special-status plants may occur on or adjacent to the Project site where they could be directly or indirectly impacted. If suitable habitat is present, the qualified biologist shall conduct botanical surveys during the appropriate blooming period and conditions for special-status plants prior to the start of construction. More than one year of surveys may be necessary and a minimum of two years is likely necessary for Sebastopol meadowfoam. Surveys shall be conducted

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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 visiting reference populations, unless otherwise approved in writing by CDFW. The habitat assessment and survey reports shall be submitted to CDFW for written approval prior to the start of construction. If any special-status plant species are observed, the project shall fully avoid direct and indirect impacts to all individuals and prepare and implement a CDFW-approved avoidance plan prior to project activities. If full avoidance is not possible, project activities may not commence until the Permittee has consulted with CDFW and obtained CDFW's written approval prior to the start of construction, which may include salvaging topsoil, transplanting individuals, compensatory habitat, or other measures. If impacts to state listed plants such as Sebastopol meadowfoam cannot be avoided, the Project shall obtain a CESA ITP from CDFW and comply with the ITP. The Project shall consult with USFWS for any impacts to federally listed plants, including but not limited to Sebastopol meadowfoam.

COMMENT 4: To reduce impacts to foothill yellow-legged frog to less-than-significant, CDFW recommends including the below mitigation measure in the draft EIR.

Foothill Yellow Legged Frog Surveys and Methodology. A qualified biologist shall provide a foothill yellow-legged frog survey methodology for CDFW review and written approval at least 30 days prior to conducting Project activities, unless otherwise approved in writing by CDFW. Project activities shall not begin until foothill yellow-legged frog surveys have been completed using the methodology approved by CDFW. Survey methodology should include:

- Targeting all life stages;
- Carefully searching under rocks, within vegetation such as sedges and other clumped vegetation, and under undercut banks;
- Carefully searching within a minimum of 50 feet from top of bank on both sides of the stream and a minimum of 500 feet upstream and downstream of the Project area in any suitable habitat with persistent moisture;
- Surveys conducted at different times of day and under variable weather conditions; if possible, and
- Avoiding windy days (15 miles per hour or greater), as ripples in the water make it more challenging to detect frogs.

Prior to starting Project activities, a qualified biologist shall conduct surveys for foothill yellow-legged frog using the CDFW-approved methodology, unless otherwise approved in writing by CDFW. The results of the surveys shall be emailed to CDFW

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(See Contact Information section), or if unavailable another CDFW representative, and Permittee shall obtain CDFW's written approval of the survey results prior to starting Project activities. If foothill yellow-legged frog or their eggs are found, Permittee shall install exclusionary fencing and prepare and implement a foothill yellow-legged frog Habitat Improvement Plan, unless otherwise approved in writing by CDFW.

If documentation is provided to CDFW that the stream has been completely dry for at least 30 days prior to starting Project activities, and no water or moist areas within 50 feet from top of bank on both sides of the stream and 500 feet upstream and downstream of the Project area, then a methodology and surveys for foothill yellow-legged frog are not necessary.

COMMENT 5: To reduce potential impacts to roosting bats to less-than-significant, CDFW recommends including the below mitigation measure in the draft EIR.

Roosting Bat Habitat Assessment and Surveys: Prior to any tree removal, a qualified biologist shall conduct a habitat assessment for bats. A qualified bat biologist shall have: 1) at least two years of experience conducting bat surveys that resulted in detections for relevant species, such as pallid bat, with verified project names, dates, and references, and 2) experience with relevant equipment used to conduct bat surveys. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to tree removal and shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark, suitable canopy for foliage roosting species). If suitable habitat trees are found, or bats are observed, Roosting Bat Tree Protections (see below) shall be implemented.

Roosting Bat Tree Protections: If the qualified biologist identifies potential bat habitat trees, then tree trimming and tree removal shall not proceed unless the following occurs: 1) a qualified biologist conducts night emergence surveys or completes visual examination of roost features that establishes absence of roosting bats, or 2) tree trimming and tree removal occurs only during seasonal periods of bat activity, from approximately March 1 through April 15 and September 1 through October 15, and tree removal occurs using the two-step removal process. Two-step tree removal shall be conducted over two consecutive days. The first day (in the afternoon), under the direct supervision and instruction by a qualified biologist with experience conducting two-step tree removal, limbs and branches shall be removed by a tree cutter using chainsaws only; limbs with cavities, crevices or deep bark fissures shall be avoided. The second day the entire tree shall be removed.

COMMENT 6: To reduce potential impacts to white-tailed kite and other nesting birds to less than significant, CDFW recommends including the below mitigation measure in the draft EIR.

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Nesting Bird Surveys: If construction, grading, vegetation removal, or other project-related activities are scheduled during the avian nesting season, February 1 to August 31, a qualified biologist shall conduct a survey for active bird nests within seven days prior to the beginning of project-related activities. The survey shall cover the entire Project site and a minimum 500-foot buffer around the Project site. If a lapse in project-related work of seven days or longer occurs, another survey shall be conducted before project work can be reinitiated. If an active nest is found during surveys, the qualified biologist shall immediately notify the CDFW contact below, or if unavailable another CDFW representative, and establish site- and species-specific no-work buffers to ensure the nest is not disturbed. The buffer distances shall be specified to protect the bird's normal behavior to prevent nesting failure or abandonment and comply with Fish and Game Code section 3500 et seq. and the federal MBTA. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established.

The qualified biologist shall monitor the behavior of the birds (adults and young, when present) at the nest site to ensure that they are not disturbed by project work. Nest monitoring shall continue during Project work until the young have fully fledged (have completely left the nest site and are no longer being fed by the parents), as determined by the qualified biologist, unless otherwise approved in writing by CDFW.

Please be advised that an LSA agreement issued by CDFW for the Project would likely include the above mitigation measures, as applicable, in addition to other protective measures for fish and wildlife resources.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs 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 online field survey form and other methods for submitting data can be found 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://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

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FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). 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.

If you have any questions, please contact 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,

Signed by:

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024070955)

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ATTACHMENT 1: Special-Status Species

| Scientific Name | Common Name | Status |
|---|--|-------------------|
| Amphibians and Reptiles | | |
| <i>Actinemys marmorata</i> | northwestern pond turtle | FC, SSC |
| <i>Dicamptodon ensatus</i> | California giant salamander | SSC |
| <i>Rana boylei</i> pop. 1 | foothill yellow-legged frog - north coast DPS | SSC |
| Birds | | |
| <i>Elanus leucurus</i> | white-tailed kite | FP |
| <i>Progne subis</i> | purple martin | SSC |
| Fishes | | |
| <i>Oncorhynchus mykiss irideus</i> pop. 8 | steelhead - central California coast DPS | FT, SSC |
| <i>Oncorhynchus tshawytscha</i> pop. 13 | chinook salmon - Central Valley fall / late fall-run ESU | SSC |
| <i>Cottus gulosus</i> | rifle sculpin | SSC |
| <i>Lavinia symmetricus symmetricus</i> | Central California roach | SSC |
| <i>Mylopharodon conocephalus</i> | hardhead | SSC |
| <i>Entosphenus tridentata</i> | Pacific lamprey | SSC |
| Invertebrates | | |
| <i>Syncaris pacifica</i> | California freshwater shrimp | FE, SE |
| Mammals | | |
| <i>Antrozous pallidus</i> | pallid bat | SSC |
| Plants | | |
| <i>Limnanthes vinculans</i> | Sebastopol meadowfoam | SE, FE, CRPR 1B.1 |
| <i>Lasthenia conjugens</i> | Contra Costa goldfields | FE, CRPR 1B.1 |

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|---|------------------------------|-----------|
| <i>Amorpha californica</i> var. <i>napensis</i> | Napa false indigo | CRPR 1B.2 |
| <i>Erigeron greenei</i> | Greene's narrow-leaved daisy | CRPR 1B.2 |
| <i>Eryngium jepsonii</i> | Jepson's coyote-thistle | CRPR 1B.2 |
| <i>Layia septentrionalis</i> | Colusa layia | CRPR 1B.2 |
| <i>Leptosiphon jepsonii</i> | Jepson's leptosiphon | CRPR 1B.2 |
| <i>Penstemon newberryi</i> var. <i>sonomensis</i> | Sonoma beardtongue | CRPR 1B.3 |
| <i>Sidalcea oregana</i> ssp. <i>hydrophila</i> | marsh checkerbloom | CRPR 1B.2 |
| <i>Trichostema ruygtii</i> | Napa bluecurls | CRPR 1B.2 |
| <i>Brodiaea leptandra</i> | narrow-anthered brodiaea | CRPR 1B.2 |

FP = state fully protected under Fish and Game Code; SE = state listed as endangered under CESA; ST = state listed as threatened under CESA; FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; FC= Federal Candidate Species; SSC = state Species of Special Concern; DPS = Distinct Population Segment; ESU = Evolutionarily Significant Unit; CRPR = California Rare Plant Rank¹

¹ CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).