

**CITY OF NAPA
GENERAL PLAN UPDATE
PARTIAL RECIRCULATED DRAFT
ENVIRONMENTAL IMPACT REPORT (SCH#
2021010255)**

PREPARED FOR:

City of Napa
Community Development Department
1600 First Street
Napa, CA 94559
Contact: Michael Walker, Senior Planner
(707) 257-9530

PREPARED BY:

ICF, Jones & Stokes, Inc.
980 9th Street, Suite 1200
Sacramento, CA 95814
Contact: James Alcorn, Project Manager
(916) 737-3000

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Acronyms and Abbreviations

CAL FIRE	California Department of Forestry and Fire Protection
CDFW	California Department of Fish and Wildlife
CEQA	State California Environmental Quality Act
CFR	Code of Federal Regulations
City	City of Napa
DEIR	draft environmental impact report
FMMP	Farmland Mapping and Monitoring Program
FPPA	Farmland Protection Policy Act
GIS	geographic information systems
LTNC	Land Trust of Napa County
NOP	Notice of Preparation
NRCS	Natural Resources Conservation Service
Partial Recirculated DEIR	Partial Recirculated Draft Environmental Impact Report
RCD	Napa County Resource Conservation District
RUL	Residential Urban Limit
SB	Senate Bill
USC	U.S. Code
USDA	U.S. Department of Agriculture's

1.1 Background and Purpose of this Document

The City of Napa (City) released the Napa General Plan update (Project) draft environmental impact report (DEIR) for a 57-day public review period on March 10, 2022. The text of the General Plan update and other information and resources are available on the City’s General Plan update website at <https://napa2040.com/>.

Section 15088.5 of the State California Environmental Quality Act (CEQA) Guidelines provides that all or a portion of a DEIR shall be recirculated for public review and comment prior to certification when significant new information is added to the DEIR. “Recirculation” simply means that the public is provided an opportunity to comment on the new or revised sections of the DEIR. Recirculation is not required where the new information merely clarifies or amplifies or makes insignificant modifications to the DEIR.

1.1.1 Reason for Partial Recirculation

The State CEQA Guidelines indicate that “significant new information” requiring recirculation would include a new significant environmental impact or a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance, or a feasible project alternative or mitigation measure considerably different from others previously analyzed in the DEIR (Section 15088.5a). The Napa General Plan update DEIR (State Clearinghouse #2021010255) has been partially revised to include the Agricultural and Forestry Resources section.

This section has been prepared as a Partial Recirculated Draft Environmental Impact Report (Partial Recirculated DEIR) for the City of Napa General Plan update. The environmental analysis in Chapter 2 addresses a public comment on the Project’s DEIR published in March 2022 that noted that the DEIR did not discuss impacts on Agricultural Resources. The Notice of Preparation (NOP) dated January 22, 2021, stated: “There is reasonable potential that the project would result in less-than-significant environmental effects related to Agriculture and Forestry Resources; thus, it is anticipated that this topic will be discussed in the Less than Significant Impacts chapter in the EIR.” The Agricultural and Forestry Resources section of the DEIR inadvertently omitted this section; therefore, it is now included. No comments were received in response to the NOP pertaining to agricultural resources, and this topic was not discussed at the public scoping meeting held on January 27, 2021.

1.2 Document Format

This program Partial Recirculated DEIR is organized into the following sections.

- Chapter 1, *Introduction*, describes this Partial Recirculated DEIR's purpose and legal requirements, as well as its intended use. It contains an outline of the document and a list of the environmental issues that are discussed in this Partial Recirculated DEIR.
- Chapter 2, *Agricultural and Forestry Resources*, presents the environmental analysis for just the Agricultural and Forestry Resource section, includes the discussion of the regulatory and environmental setting, and thresholds of significance for determining the severity of potential environmental impacts.

1.3 Public Review Process

The Partial Recirculated DEIR will be available for a 45-day public review period, from June 17, 2022, to August 1, 2022. The Partial Recirculated DEIR was circulated to state agencies for review through the State Clearinghouse of the Governor's Office of Planning and Research. Copies of the Partial Recirculated DEIR are available for public review on the City's website at <https://napa2040.com/>.

Written comments on this Partial Recirculated DEIR can be submitted by mail to:

City of Napa Community Development Department
1600 First Street
Napa, CA 94559
Contact: Michael Walker, Senior Planner
Phone: 707.257.9530
mwalker@cityofnapa.org

1.3.1 Limitation on Comments

State CEQA Guidelines Section 15088.5(f)(2) states that:

When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

In keeping with this provision, **the City of Napa requests that commenters limit their written comments to the new material presented in this Partial Recirculated DEIR, which consists of the Agricultural and Forestry Resources section.**

1.4 Use of this Document

This Partial Recirculated DEIR will be combined with the previously circulated 2021 DEIR as part of the Final EIR. The Final EIR will include the comments received on the DEIR and Partial Recirculated DEIR, along with written responses to those comments.

The City Council will certify the Final EIR prior to completing its deliberations on the Project. If it approves the Project, then the City Council will adopt the findings, statement of overriding considerations, and mitigation monitoring and reporting program that are required by CEQA.

This Partial Recirculated DEIR is not the Final EIR. The Final EIR will include other revisions and clarifications in response to the comments received on the DEIR.

2.1 Agricultural and Forestry Resources

This section assesses potential environmental impacts on agricultural and forestry resources from future development under the Project, including those related to farmland as identified by the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency; agricultural zoning and Williamson Act contracts; and the conversion of farmland to non-agricultural uses or forestland to non-forest use. This section describes existing agricultural and forestry resources in the Planning Area, as well as relevant federal, State, and local regulations and programs.

2.1.1 Existing Conditions

2.1.1.1 Regulatory Setting

This section describes relevant federal, State, and local regulations applicable to the Project.

Federal

U.S. Department of Agriculture Natural Resources Conservation Service

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) maps soils and farmland uses to provide comprehensive information necessary for understanding, managing, conserving, and sustaining the nation's limited soil resources. In addition to many other natural resource conservation programs, the NRCS manages the Farmland Protection Program, which provides funds to help purchase development rights to keep productive farmland in agricultural uses. Working through existing programs, USDA joins with state, tribal, or local governments to acquire conservation easements or other interests from landowners.

Federal Farmland Protection Policy Act, 7 U.S. Code Section 4201 and 7 Code of Federal Regulations 658

The NRCS oversees the Farmland Protection Policy Act (FPPA) (7 U.S. Code [USC] Section 4201 et seq.; see also 7 Code of Federal Regulations [CFR] 658). The FPPA (a subtitle of the 1981 Farm Bill) is designed "to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses." The FPPA applies to projects and programs that are sponsored or financed in whole or in part by the federal government and does not apply to private construction projects subject to federal permitting and licensing, projects planned and completed without assistance from a federal agency, federal projects related to national defense during a national emergency, or projects proposed on land already committed to urban development. The FPPA spells out requirements to ensure federal programs to the extent practical are compatible with state, local, and private programs, and policies to protect farmland and calls for the use of the Land Evaluation and Site Assessment system to aid in analysis.

State

Farmland Mapping and Monitoring Program

The California Department of Conservation FMMP classifies farmland into five different categories based on soil type and current land use, described below. The minimum mapping unit is 10 acres, unless specified (California Department of Conservation 2019).

- **Prime Farmland.** Land that has the best combination of physical and chemical characteristics for crop production. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when managed (including water management) according to current farming methods. Prime Farmland must have been used for the production of crops within the last three years.
- **Farmland of Statewide Importance.** Land other than Prime Farmland that has a good combination of physical and chemical characteristics for crop production. Similar to Prime Farmland, Farmland of Statewide Importance must have been used for crop production within the last three years.
- **Unique Farmland.** Land that does not meet the criteria for Prime Farmland or Farmland of Statewide Importance, but which is currently used for the production of specific high economic value crops (as listed in the last three years by the California Department of Food and Agriculture). It has the special combination of location, soil quality, growing season, and moisture supply to produce sustained high quality or high yields of a specific crop (e.g., oranges, olives, avocados, rice, grapes, and cut flowers) when treated and managed according to current farming practices.
- **Farmland of Local Importance.** Land that is either currently producing crops or has the capability to do so. It is land other than Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, but it may be important to the local economy due to its productivity.
- **Grazing Land.** Land on which the existing vegetation, whether grown naturally or through management, is suitable for livestock grazing.

CEQA Section 21095 and CEQA Guidelines, Appendix G, together, define Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as “Farmland,” of which conversion to non-agricultural uses may be considered a significant impact.

California Farmland Conservancy Program

The California Farmland Conservancy Program (Public Resources Code Section 10200 et seq.) supports the voluntary granting of agricultural conservation easements from landowners to qualified nonprofit organizations, such as land trusts, as well as local governments. Conservation easements are voluntarily established restrictions that are permanently attached to property deeds, with the general purpose of retaining land in its natural, open space, agricultural, or other condition while preventing uses that are deemed inconsistent with the specific conservation purposes expressed in the easements. Agricultural conservation easements define conservation purposes that are tied to keeping land available for continued use as farmland. Such farmlands remain in private ownership and the landowner retains all farmland use authority, but the farmland is restricted in its ability to be subdivided or used for non-agricultural purposes, such as urban uses.

California Land Conservation Act (Williamson Act)

Williamson Act Contracts

The California Land Conservation Act (Government Code Section 51200 et seq.) of 1965, commonly known as the Williamson Act, provides a tax incentive for the voluntary enrollment of agricultural and open space lands in contracts between local government and landowners. The contract restricts the land to agricultural and open space uses and compatible uses defined in State law and local ordinances. An agricultural preserve, which is established by local government, defines the boundary of an area within which a city or county will enter into contracts with landowners. Local governments calculate the property tax assessment for lands under contract based on the actual use of the land rather than the potential land value assuming full development.

Williamson Act contracts are effective for periods of 10 years and longer. The contract is automatically renewed each year, maintaining a constant, 10-year contract, unless the landowner or local government files to initiate non-renewal. Should that occur, the Williamson Act would terminate 10 years after the filing of a notice of non-renewal. Only a landowner can petition for a contract cancellation. Tentative contract cancellations can be approved only after a local government makes specific findings and determines the cancellation fee to be paid by the landowner.

The State of California has the following policies regarding public acquisition of and locating public improvements on lands in agricultural preserves and on lands under Williamson Act contracts (Government Code Section 51200 et. seq.):

- Avoid locating federal, State, or local public improvements and improvements of public utilities, and the acquisition of land, in agricultural preserves;
- Locate public improvements that are in agricultural preserves on land other than land under Williamson Act contract; and
- Any agency or entity proposing to locate such an improvement, in considering the relative costs of parcels of land and the development of improvements, consider the value to the public of land, particularly prime agricultural land, in an agricultural preserve.

In Napa County, a parcel must be zoned Agriculture Preserve or Agricultural Watershed, be 40 acres in size for non-prime agricultural land or 10 acres in size for prime agricultural land and contain a bona fide agricultural use to qualify for a Williamson Act Contract. The County also offers a contract for parcels between five and 10 acres, provided the agricultural use demonstrates a unique commitment to sustainable farming practices and contributes to the diversity of crops raised in Napa County (i.e., other than wine grapes) in addition to other specific conditions.

Although there are Agricultural Resource designations/zoning districts under the current General Plan (1998) and zoning (described below), the City of Napa has not established specific policy or regulation regarding Williamson Act contracts, and there are no Williamson Act contracts located within the Planning Area.

Farmland Security Zone Contracts

Since 1998, another option in the Williamson Act Program has been established with the creation of Farmland Security Zone contracts. A Farmland Security Zone is an area created within an agricultural preserve by a board of supervisors upon the request of a landowner or group of

landowners. Farmland Security Zone contracts offer landowners greater property tax reduction and have a minimum initial term of 20 years. Like Williamson Act contracts, Farmland Security Zone contracts renew annually unless a notice of non-renewal is filed. Potential cancellation of Williamson Act and Farmland Security Zone contracts would be addressed in subsequent project-level documents.

Open Space Subvention

Under the Open Space Subvention Act of 1971, the State has provided annual subvention payments to counties for foregone property tax revenue due to Williamson Act contracts. The Budget Act of 2009 virtually eliminated these payments for the 2009-10 fiscal year. While partial funding was restored for the 2010-11 fiscal year, long-term State support to counties for agricultural land conservation is uncertain. Despite the elimination of most payments from the State, the California Department of Conservation has continued to release status reports of lands under Williamson Act contracts, with the most recent release occurring in 2015.

Solar Use Easements

In 2011, California passed Senate Bill (SB) 618 (Chapter 596, Statutes of 2011) authorizing property owners under Williamson Act or Farmland Security Zone contracts to rescind the contract and simultaneously enter into a solar-use easement. Solar-use easements require the land to be used for solar photovoltaic facilities for a term of 20 years.

Forest Practice Rules

The Z'berg-Nejedly Forest Practice Act of 1973 established a set of rules known as the Forest Practice Rules to be applied to forest management related activities (i.e., timber harvests, timberland conversions, fire hazard removal, etc.) on privately owned timberlands in California. They are intended to ensure that timber harvesting is conducted in a manner that will preserve and protect fish, wildlife, forests, and streams. Under the Forest Practice Act, a Timber Harvesting Plan is submitted to the California Department of Forestry and Fire Protection (CAL FIRE) by the landowner outlining what timber is proposed to be harvested, the harvesting method, and the steps that will be taken to prevent damage to the environment. If the landowner intends to convert timberland to non-timberland uses, such as a winery or vineyard, a Timberland Conversion Permit is required in addition to the Timber Harvesting Plan. It is CAL FIRE's intent that a Timber Harvesting Plan will not be approved if it fails to adopt feasible mitigation measures or alternatives from the range of measures set out or provided for in the Forest Practice Rules, which would substantially lessen or avoid significant adverse environmental impacts resulting from timber harvest activities. Timber Harvesting Plans are required to be prepared by registered professional foresters who are licensed to prepare these plans.

California Forest Taxation Reform Act of 1976

The California Forest Taxation Reform Act of 1976 made significant modifications to the manner in which annual property taxes for timber and timberlands are assessed in California. The act placed values on bare land that are related to its ability to grow trees, and it substituted a percentage tax on the value of timber at the time of harvest ("yield" tax) for the annual property tax on the trees. In exchange for this tax benefit, landowners had to be willing to dedicate their timberland to timber growing and compatible uses for a period of at least 10 years. Unless terminated by the county or

landowner, these 10 years renew each year, thus creating a rolling minimum or self-perpetuating 10-year commitment.

Lands zoned in this manner are called Timberland Production Zones. Total acres of Timberland Production Zones ostensibly indicate land that is committed to timber growing and compatible uses, thus forming the long-term productive base of the state's privately owned forestland. There are no Timberland Production Zones in the Planning Area.

Local

Napa County Measure A and City of Napa Charter Section 180

In 1979, Napa County voters adopted Measure A, which determined that County lands outside the City of Napa's urban growth boundary—then referred to as the "Residential Urban Limit" (RUL) line—would be limited for resource use, agriculture, or very-low-density residential development (e.g., 20-acre minimum lot sizes). The area bounded by the RUL line included both City and unincorporated lands, and while the County was not bound by the City's RUL line, it cooperated with the City by requiring annexation of lands within the RUL to the City prior to urbanization. In 1982, the City renamed the boundary as the "Rural Urban Limit" (RUL) line, and in 1999, City of Napa voters approved a ballot measure to incorporate the RUL line into the City Charter (Section 180), excerpted below:

The RUL shall not be amended or modified, and no urban development shall be permitted in any area outside the RUL except as approved by the City's voters, following approval by the City's Planning Commission and City Council as a General Plan amendment. Notwithstanding the foregoing, the RUL may be changed, modified or amended as a General Plan amendment by four-fifths (4/5) vote of the City Council, without approval by the voters, where necessary to comply with state or federal law, or to allow any community or recreational facilities, parks, public service facilities including, but not limited to, fire and police stations and substations, or similar facilities sponsored or developed by the City of Napa, the Napa Valley Unified School District, or other public educational facilities.

City water services may not be provided outside the RUL except for certain purposes such as community facilities, recreational facilities, parks, public service facilities, and public-school facilities or for interruptible surplus agricultural water service. Since its original adoption, the RUL line has been amended only once, in November 2014, to incorporate into the urban side an approximately 154-acre site known as the Napa Pipe Property (generally east of Napa River and north of State Route 29). In accordance with the RUL, the Project anticipates all new growth within the existing (as of 2021) boundary; no growth is planned outside of the RUL line.

City of Napa General Plan

The current City of Napa General Plan was adopted in 1998 and has a planning horizon of 2020. The *Land Use and Open Space and Natural Resources* elements of the current General Plan include policies that pertain to agricultural resources. For example, land use policies include discretionary review of development projects adjacent to or within one-quarter mile of agricultural resources or other areas devoted to permanent agricultural activities. The current General Plan designation for Resource Areas correspond to the current zoning district Agricultural Resource. This designation applies to lands at the western periphery of the Planning Area such as Browns Valley/Timberhill, Napa Oaks, and Stanly Ranch. Agricultural uses are also allowed in areas currently designated as Greenbelt, which includes Alston Park and Trancas Crossing. Natural resources policies seek to protect the aesthetic identity and recreational value of agricultural lands in Napa and coordinate

natural resource conservation with the Napa County Resource Conservation District (discussed under the *Environmental Setting* subsection). Policies generally seek to provide multi-use trails that connect the city to surrounding agricultural lands where such trails would not impact agricultural uses. The *Open Space and Natural Resources Element* also recognizes the 12-acre Connolly Ranch site, acquired by the Napa County Land Trust in 1991 and located next to Westwood Hills Park, as a restored agricultural and environmental education center for the public.

City of Napa Municipal Code

Title 17 of the City of Napa Municipal Code is the City's Zoning Ordinance. Section 17.52.040 describes Agricultural Buffers, which establish setbacks from the Rural-Urban Limit line to provide buffers that protect agricultural uses in surrounding County lands from urban development within the City. The extent of the RUL line is mapped in Figure 2-1. The Agricultural Resource District applies to lands discussed above that are designated as Agricultural Resource by the current General Plan, in addition to the land east of Napa State Hospital and the hills along Montecito Boulevard. All uses in the Agricultural Resource zoning district require a conditional use permit except one single-family residence per parcel.

2.1.1.2 Environmental Setting

Agricultural Context

California is the country's leading agricultural producer and exporter (U.S. Department of Agriculture Economic Research Service 2021). The Planning Area is located in Napa County, which ranked 24th out of 58 California counties for gross value of agricultural production at about \$4.66 million in 2020. The county's top four commodities by gross value in 2021 were wine grapes, cattle and calves (unspecified), miscellaneous livestock products, and vegetables (unspecified). (California Department of Food and Agriculture 2022) There are 255,778 acres of farmland in Napa County, and approximately 26 percent of this farmland is used as cropland (U.S. Department of Agriculture 2019).

In California, productive farmland acreage has been gradually declining, due primarily to the conversion of farmland to non-agricultural uses. Between 1984 and 2016, the area of farm and grazing lands in the state declined by more than 1.5 million acres, including a loss of 777,440 acres of Prime Farmland, the farmland type with the best soils for agricultural production (California Department of Conservation Division of Land Resource Protection 2019). For the period between 2012 and 2014, Napa County was among the top ten counties in the state that lost irrigated farmland to urban land, and between 2014 and 2016, the county lost 125 acres of important farmland (i.e., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) to urban land (California Department of Conservation Division of Land Resource Protection 2019).

Napa County Resource Conservation District

The Napa County Resource Conservation District (RCD) was established in June 1945 as a special district under Division 9 of the California Public Resources Code. The RCD is an autonomous self-governing local government agency created to develop and further soil and water conservation, and it functions as a "grass-roots" organization dedicated to implementing projects on public and private lands and educating landowners and the public about resource conservation on a voluntary basis. The RCD's mission is to empower the community to voluntarily conserve, protect, and restore

natural resources in a landscape that supports agriculture, urban areas, and wild spaces by providing technical assistance, educational programs, monitoring programs and funding sources to help land managers improve their conservation practices. The Napa County RCD does not have regulatory authorities and relies on partnerships with individuals, community organizations, and other government agencies to fund and implement its conservation programs.

The Napa County RCD covers over 500,000 acres of predominantly rural land in Napa and Solano counties, including the Napa River watershed from Mt. St. Helena to the Napa-Sonoma Marsh, much of the Putah Creek watershed, and the upper portion of the Suisun Creek watershed. The incorporated area of the City of Napa, as it was in 1945, is not within the boundaries of the Napa County RCD; however, RCD services are provided to this area. As noted in the *Regulatory Setting*, current General Plan policies seek to coordinate protection of natural resources, including agricultural resources, in the City of Napa with the Napa County RCD.

Land Trust of Napa County

The Land Trust of Napa County (LTNC) is a community-based nonprofit established in 1976 that seeks to preserve the character of Napa County by permanently protecting land. Over 46 years, the land trust has completed 240 projects and protected over 86,000 acres of land – 16 percent of the county. The land trust works cooperatively with landowners and the community to protect agricultural land, water resources, wildlife and wildlife corridors, scenic open space, forests, ranches, wildflower meadows, and native biodiversity throughout the county through conservation easements or direct land acquisition (Land Trust of Napa County 2022).

There are four land protection projects completed by LTNC within the Planning Area, including:

- **Alston Park.** 157 acres of publicly accessible, recreational open space land in the City of Napa's northwest area.
- **Connolly Ranch (1991).** A 12-acre urban farm adjoining Westwood Hills Park that houses environmental and agricultural educational programs for over 3,000 Napa students per year. In 2011, the property was leased to the Connolly Ranch Environmental Education nonprofit program.
- **Stanly Ranch Wetlands (2004).** 261 acres of wetlands that have been threatened with homesite development numerous times over the last 20 years. These lands are now permanently protected through California Department of Fish and Wildlife (CDFW), who will restore these lands to wetland wildlife habitat.
- **Trancas Crossing Park (2001).** 33 acres initially donated as a conservation easement, as well as land transferral to the LTNC, who subsequently transferred ownership to the City of Napa for use as an open space park. The Trancas Crossing Park opened in September of 2011 and provides recreational opportunities for bikers, runners and dog walkers and serves as the northern terminus for the Napa River Trail and Napa River boat launch.

Agricultural Resources

Although the Planning Area is surrounded by a regional agricultural context, the Planning Area itself is largely classified as urban and built-up land. As summarized in Table 2-1, there are 1,537 acres of

land within the RUL line¹ that are considered farmland under FMMP. Of these, 473 acres are defined as farmland for environmental analysis under CEQA. These farmlands are mapped in Figure 2-1, which shows that a vast majority of farmland in the Planning Area within the RUL line is located in the Stanly Ranch preserve area. Other smaller areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland include the area east of Timberhill Park on Oak Rock Lane and Buhman Avenue; the vineyards along Borette Lane, north of Partrick Road; the vineyards northwest of the State Routes 12 and 221 interchange; agricultural uses on the southeast corner of Napa Valley College; a portion of the land at the eastern terminus of Trower Avenue; and the agricultural plots north of Salvador Creek (west of Jefferson Street and south of El Centro Avenue). As described, some of these lands have existing agricultural uses such as vineyards, while others do not have active agricultural uses or are vacant. The agricultural area within the Napa Valley College campus is used for educational purposes. The current zoning of the Napa Valley College site is Public/Quasi-Public Schools and Health Facilities, the Stanly Ranch area is Agricultural Resource, and the vineyards northwest of the State Routes 12 and 221 interchange are Industrial Park; all other sites currently have residential zoning designations.

Table 2-1. Farmland within the Rural-Urban Limit

Type	Acres
CEQA Farmland	
Prime Farmland	34
Farmland of Statewide Importance	395
Unique Farmland	44
Subtotal	473
Other FMMP Farmland	
Grazing Land	630
Farmland of Local Importance	433
Subtotal	1,063
Non-Farmland	
Urban and Built-Up Land	9,581
Other Land	884
Subtotal, Non-Farmland	10,465
Subtotal, All Farmland	1,537
Total, All Land within RUL	12,002

Source: Department of Conservation, 2018; Dyett & Bhatia, 2022

Forestry Context

California is one of the country's leading lumber producing states. The Planning Area is located in Napa County, which ranked 19th out of 58 California counties for volume of lumber produced in 2021. In 2021, a net total of 8,935,000 board-feet of lumber, valued at roughly 1.2 million dollars, was harvested in Napa County. This amount was about 0.5 percent of the total timber harvested in California during that year (California Department of Tax and Fee Administration 2021).

¹ As described in the *Regulatory Setting*, urban growth must occur within the RUL line. By design, all future growth, including under the Project, would occur within the RUL line; therefore, only lands within this boundary are discussed.

Approximately 210,600 acres of forest land in Napa County contain commercial timber species—including Douglas-fir, Western oak, Tanoak/laurel, other western softwoods, and other hardwoods groups—(Forest Inventory and Analysis 2022) and are primarily located in the Western Mountains, the Eastern Mountains, Livermore Ranch, Pope Valley, and Angwin.² Most timber harvesting in Napa County is a one-time cutting of forests and the conversion of timberlands into vineyards (County of Napa 2009).

Forestry Resources

Forest land is defined in California Public Resources Code Section 12220(g) as land that can support 10 percent native tree cover of any species under natural conditions and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The following forest lands exist within the Planning Area:

- **Oak Woodlands.** Oak woodlands are the most common forest type in the Planning Area, with over 580 acres within the RUL line. This includes four acres of Blue Oak, 260 acres of Coast Live Oak, 148 acres of Coastal Mixed Hardwood, 124 acres of Interior Mixed Hardwood, and 45 acres of Valley Oak. Of these species that occur in the Planning Area, only Valley Oak is designated as a sensitive (rank S3) natural community and a rare species by the CDFW. For more information about sensitive species and biological resources, see Section 3.3, *Biological Resources* of the Draft EIR.
- **Riparian Woodlands.** There are 229 acres of riparian woodlands within the RUL line, including 146 acres of Mixed Riparian Hardwood, 49 acres of Riparian Hardwood, and 34 acres of Willow. CDFW has designated Riparian Hardwood and Mixed Riparian Hardwood as sensitive (rank S3) natural communities and rare species.

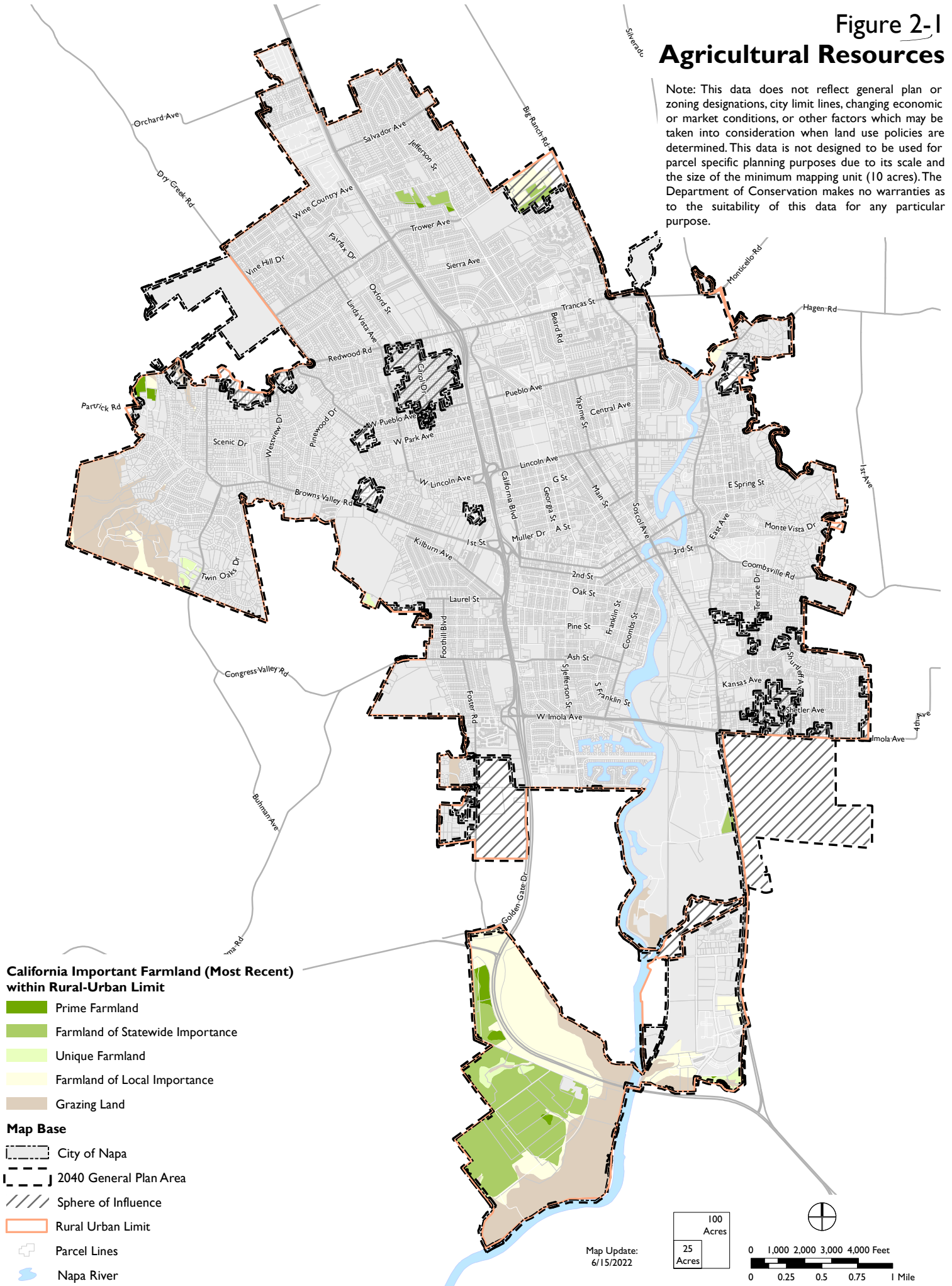
As mapped in Figure 2-2, these forest lands are relatively minimal in size and generally coincide with open space and natural areas in the Planning Area such as the tributaries of Napa River and the hills of Westwood Hills Park, Timberhill Park, Napa Oaks, and Alta Heights. Existing zoning of these lands include Park/Open Space, Agricultural Resource, Public/Quasi-Public Schools and Health Facilities, and residential designations. Some small exceptions include the areas along Browns Creek.

Timberland is defined in California Public Resources Code Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Although timber is harvested in Napa County, the Planning Area is not on one of these lands. The Planning Area is not currently designated or zoned as a Timberland Production District or for other forestry-related uses. Therefore, the site does not meet the definition for timberland provided in Public Resources Code Section 4526.

² This acreage is an estimate by the USDA Forest Service Forest Inventory and Analysis representing forest lands in Napa County, some of which include commercial timber species, but does not correspond with timberlands under the Forest Practice Act.

Figure 2-1 Agricultural Resources

Note: This data does not reflect general plan or zoning designations, city limit lines, changing economic or market conditions, or other factors which may be taken into consideration when land use policies are determined. This data is not designed to be used for parcel specific planning purposes due to its scale and the size of the minimum mapping unit (10 acres). The Department of Conservation makes no warranties as to the suitability of this data for any particular purpose.



California Important Farmland (Most Recent) within Rural-Urban Limit

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Grazing Land

Map Base

- City of Napa
- 2040 General Plan Area
- Sphere of Influence
- Rural Urban Limit
- Parcel Lines
- Napa River

Map Update:
6/15/2022

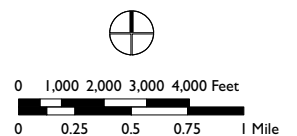


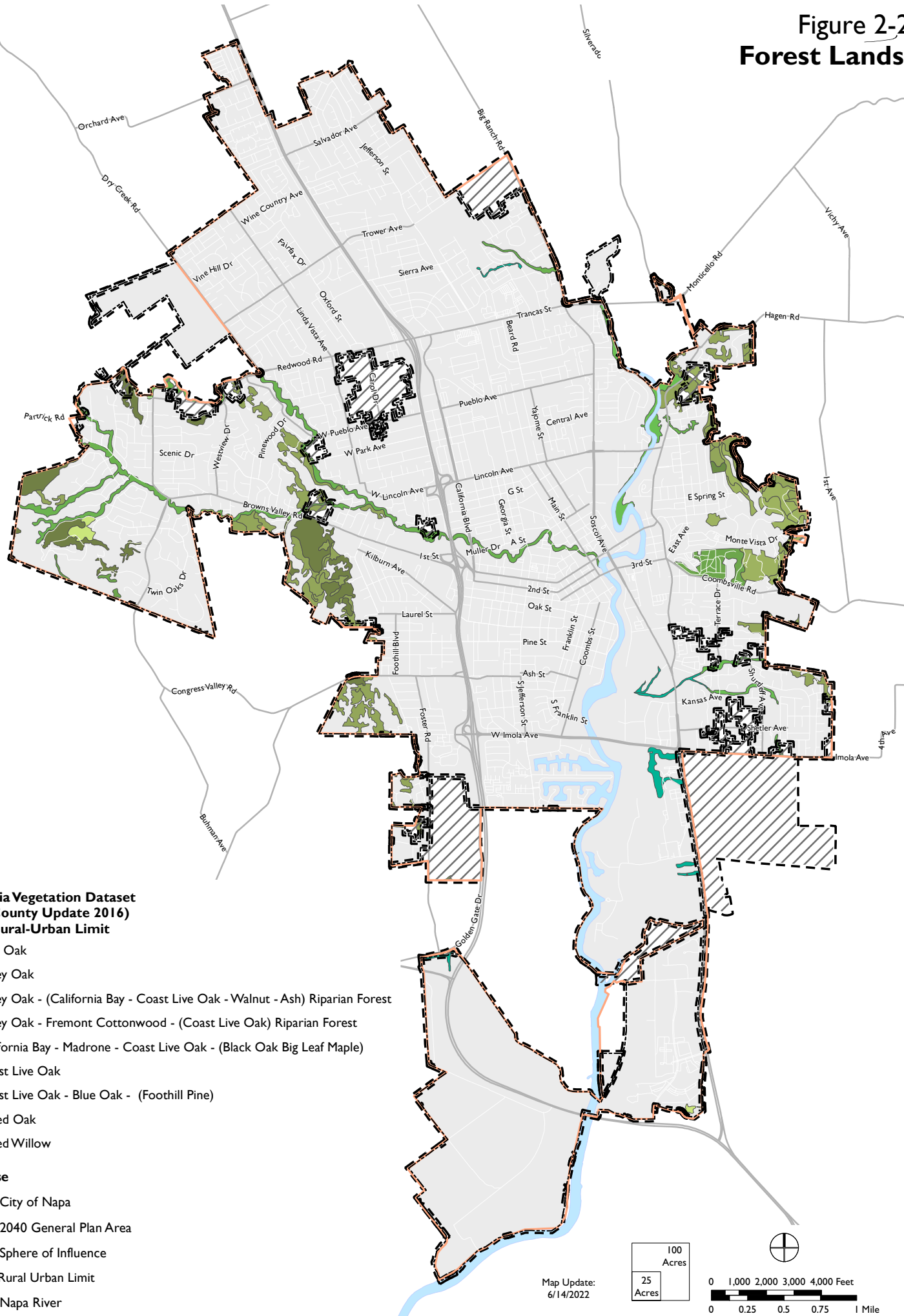
Figure 2-2
Forest Lands

**California Vegetation Dataset
(Napa County Update 2016)
within Rural-Urban Limit**

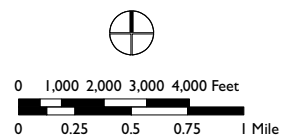
- Blue Oak
- Valley Oak
- Valley Oak - (California Bay - Coast Live Oak - Walnut - Ash) Riparian Forest
- Valley Oak - Fremont Cottonwood - (Coast Live Oak) Riparian Forest
- California Bay - Madrone - Coast Live Oak - (Black Oak Big Leaf Maple)
- Coast Live Oak
- Coast Live Oak - Blue Oak - (Foothill Pine)
- Mixed Oak
- Mixed Willow

Map Base

- City of Napa
- 2040 General Plan Area
- Sphere of Influence
- Rural Urban Limit
- Napa River



Map Update:
6/14/2022



2.1.2 Environmental Impacts

2.1.2.1 Methods for Analysis

Farmland resources within the Planning Area were assessed based on the California Department of Conservation FMMP, a biennial report and mapping resource on the conversion of farmland and grazing land. Williamson Act contract lands were identified by geographic information systems (GIS) data from Napa County. Using these sources, the Project was analyzed for potential conversion of Farmland, conversion of Williamson Act contract lands, and other changes resulting from the Project that may result in the conversion of farmland to urban uses. Forestry resources were evaluated using the definitions provided by the California Public Resources Code Sections 12220(g) and 4526.

As described in the *Regulatory Setting* and noted in the *Environmental Setting*, future growth under the Project is bounded by the RUL, and no changes are proposed outside of the RUL. (See also proposed Policy LUCD 1-1 below). As such, only lands within this boundary are considered.

Relevant General Plan Update Goals and Policies

Community Services, Parks and Recreation

Goal CSPR-4: Support schools and education-related facilities as contributors to neighborhood quality of life.

Economic Development

Goal ED-3: Strengthen the City as a global viticultural, agricultural, and culinary hub and resource center to foster linkages and innovation along the entire production, distribution, and marketing chain.

ED 3-2 Work closely with NVC to strengthen its hospitality and tourism management program and develop an agricultural resource center.

ED 3-3 Support the production and sale of local viticulture and agricultural products through land use flexibility.

Natural Resources and Conservation

Goal NRC-1: Manage natural resources, including riparian corridors, wetlands, and open space areas in and around the City, to preserve and enhance plant and wildlife habitats.

NRC 1-1 Seek to protect and enhance the riparian habitat along waterways in the City and the Napa River.

NRC 1-8 Require development projects to provide protection for significant on-site natural habitat whenever feasible, and protect significant species and groves or clusters of trees on project sites. Establish and support citywide training and support programs that provide the tools to help existing homeowners associations and residents accomplish habitat protection.

Goal NRC-3: Develop a balanced and integrated open space network reflecting a variety of considerations—resource conservation, production of resources, recreation, and aesthetic and community identity—as well as connections between various open space components, and compatibility with land use planning.

NRC 4-3 Support the Napa Land Trust and other community or non-profit organizations seeking to purchase privately-held land designated as Agriculture or Greenbelt in the General Plan or other land for habitat conservation, used to further conservation goals such as protecting riparian habitat, expanding/connecting open space, and preserving, protecting, or restoring wildlife corridors.

Land Use and Community Design

Goal LUCD-1: Maintain a compact urban form to promote a distinct community identity and protect open space and natural and agricultural resources surrounding the community.

LUCD 1-1 Focus urban development to be within the voter-approved Rural Urban Limit (RUL) to provide for the protection of the surrounding open space and agriculture uses.

LUCD 1-3 Work cooperatively with Napa County and other agencies to support maintaining the land surrounding the City as agriculture, greenbelt and rural uses while permitting the City to annex appropriate properties for urban uses.

Goal LUCD-13: Promote housing and business growth as infill development in Focus Areas in keeping with the City’s scale, services, and environment.

LUCD 13-1 Promote infill development in Focus Areas that makes efficient use of limited land supply, while ensuring compatibility and integration with adjacent uses. Ensure that uses and intensities of infill development support a cohesive development pattern.

Goal LUCD-24: Promote development of the Big Ranch Road area as a cohesive, vibrant neighborhood, integrated with the surrounding uses.

LUCD 24-1 Prior to allowing new development as part of a subdivision, require preparation of a master plan for the area in coordination with the Big Ranch Specific Plan. The street plan should provide for a walkable, connected neighborhood, with easy access to adjacent the high school, stores, and amenities on Trancas Street.

LUCD 24-2 Encourage variations in densities and housing types within the master plan, provided the overall density is within the land use designation for the area. Recognize the existing residential density in the surrounding neighborhood and promote a smooth visual transition to Medium Density development by incrementally increasing building heights and unit types.

LUCD 24-3 Encourage lower density transitions to rural edges, and identify the rural borders.

- LUCD 24-4 Residential projects should achieve the mid- to high-point of the allowed density range to maximize the use of the City’s remaining residential land where new development can be found compatible with surrounding uses.
- LUCD 24-5 Support the assemblage or consolidation of parcels to achieve the desired density ranges and quality neighborhood design.

2.1.2.2 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the Project would be considered to have a significant effect if it would result in:

- Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- Loss of forest land or conversion of forest land to non-forest use; or
- Other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use.

2.1.2.4 Impacts and Mitigation Measures

Impact AF-1: Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. (Significant and Unavoidable)

The Planning Area is predominantly urban and built-up land, but there are 473 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance mapped by the California Department of Conservation FMMP within the Planning Area’s RUL line. As described in the *Environmental Setting*, some of these areas are used for agricultural activities such as vineyards, while others are not active agricultural uses and are vacant land. Likewise, some of these sites are currently zoned for Agricultural Resource, particularly larger, contiguous areas such as Stanly Ranch and Timberhill, but some smaller areas such as the lots north of Salvador Creek on Jefferson Street and El Centro Avenue are zoned for residential use. The agricultural lots at Napa Valley College have Public/Quasi-Public designation and northwest of the State Routes 21 and 121 interchange have Industrial Park designation.

The Project seeks to concentrate infill growth along major corridors and within key Focus Areas to support walkable, transit-oriented development (goals LUCD-1 and LUCD-13 and Policy LUCD 13-1). In line with these goals and policies, proposed land use designations largely maintain existing land use/zoning designations outside of identified Focus Areas, especially Agriculture and Greenbelt areas and very-low density residential neighborhoods, as reinforced by Policy NRC 4-3. There are some exceptions, where extensive studies of existing (on-the-ground) densities in relationship to

current zoning resulted in a higher density residential designation. This applies to the farmland on El Centro Avenue north of Salvador Creek, which would change from Single Family Residential to Medium Density Residential under the Project; however, it is noted that the existing vineyard uses on this land have continued despite its residential designation. Under proposed Policy LUCD 1-1, future growth allowed by the Project is specifically limited within the RUL, and LUCD 1-3 would help preserve existing agricultural uses. Goal CSPR-4 would support existing agricultural uses for educational purposes, including the site at Napa Valley College. In addition, Goal ED-3 and policies ED 3-2 and ED 3-3 would support continued use of vineyards through land use flexibility in non-agricultural designations such as in Very-Low Density Residential and Hospitality Commercial areas.

While the proposed goals and policies described above would protect most of the farmland in the Planning Area from conversion to non-agricultural use, it is not guaranteed that farmland designated for uses other than agricultural would be preserved. Further, approximately 15 acres of Farmland of Statewide Importance in the Big Ranch Road area is part of a planned development area identified by the Project (Goal LUCD-24). Future development would be guided under a specific plan (Policy LUCD 24-1), and planned uses include low- to medium-density residential. As such, the Project would result in conversion of Farmland of Statewide Importance to non-agricultural use. Given that housing development is a main objective of the Project and that this site is currently zoned and planned for residential uses, mitigation to prevent conversion of this farmland would be contrary to the Project and not practicable. Therefore, this impact is significant and unavoidable.

Impact AF-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract. (Less than Significant)

As discussed in the regulatory and environmental setting sections, there are no Williamson Act contracts within the Planning Area. Existing zoning for agricultural use generally corresponds to the Agricultural Resource District, though some agricultural use is conditionally permitted in other zoning districts such as the Parks and Open Space District and Hillside overlay.

As discussed under Impact AF-1, the Project would target growth within identified Focus Areas and existing urban areas by promoting compact, infill development and higher densities in mixed-use areas along the Planning Area's major corridors. These areas are within the existing urban core of the Planning Area, away from existing agricultural zones, which are located along the periphery of the Planning Area. The existing zoning for Agricultural Resource would be maintained as either Agriculture or Greenbelt—or as Very Low Density Residential in some very small cases—under the Project, which continues to allow agricultural uses in all of these proposed designations. Moreover, zoning would be updated to be consistent with the Project, if adopted, as required by State law.

Given that the Project supports agricultural uses as permitted by existing zoning and that the Planning Area does not include any Williamson Act contract lands, this impact would be less than significant, and no mitigation measures are required.

Impact AF-3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). (No Impact)

No areas within the Planning Area are currently zoned forest land, timberland, or Timberland Production Districts. Therefore, implementation of the Project would have no impact with respect to

conflicts with existing zoning for forest land, timberland, or Timberland Production Districts in the Planning Area.

Impact AF-4: Loss of forest land or conversion of forest land to non-forest use. (Less than Significant)

As stated above, the Project would only develop within the RUL and concentrate future development within the Focus Areas and other planned development sites (goals LUCD-1 and LUCD-13 and policies LUCD 1-1, LUCD 1-3, and LUCD 13-1). The Project does not anticipate significant growth outside of these areas and specifically contains policies to ensure that sufficient buffers and other considerations protect existing natural resources, including forest land, within the Planning Area. As described in the *Environmental Setting*, most of the existing forest land in the Planning Area is located within parks, open space, and natural areas such as along creeks; Goals NRC-1 and NRC-3 and policies NRC 1-1, NRC 1-8, and NRC 4-3 protect these areas and the resources within them. Implementation of the Project would therefore preserve forest lands to the greatest extent feasible with respect to the loss of forest land or conversion of forest land to non-forest use in the Planning Area. As such, this impact is less than significant, and no mitigation measures are required.

Impact AF-5: Other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use. (Significant and Unavoidable)

As discussed under Impact AF-4, the Project would not result in changes to existing forest land or forest uses. However, as described under Impact AF-1, implementation of the Project has the potential to introduce non-agricultural uses such as higher density residential on or near farmland (e.g., the vineyard on El Centro Avenue north of Salvador Creek), and the Project would also convert agricultural uses of Farmland of Statewide Importance at the Big Ranch Road area to residential uses (Goal LUCD-24 and policies LUCD 24-1 through LUCD 24-5). While concentrated infill development within Focus Areas and other planned growth sites would reduce changes to existing environments adjacent to or near other existing farmland or forest land and thereby reduce the likelihood of conversion of these lands to non-agricultural or non-forest use (respectively), the targeted objective of residential development in the Big Ranch Road area constitutes a significant and unavoidable impact, with no feasible mitigation measures.

Cumulative Effects on Agricultural and Forestry Resources

The Project could lead to development of up to 473 acres of Important Farmland, as described in Impact AF-1. This conversion from agricultural land use to urban land use constitutes a significant and unavoidable impact. Further, if the City of Napa becomes fully developed within the RUL line, some of which are currently designated Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance, could be considered for development. Napa County as a whole has strong agricultural preservation land use policies, and its 2013 Napa County General Plan promotes urban-centered growth and protections for agricultural lands (Napa County 2013). The Project's emphasis on infill growth along major corridors and within key Focus Areas fits with Napa County's policies, concentrating growth in the urban core and disincentivizing growth in surrounding farmlands. However, development pressures will likely result in the conversion of more farmland, and implementation of the Project would result in contributing farmland conversion and indirect effects to agricultural uses. Between 1990 and 2010, over 4,200 acres of greenfield development occurred in Napa County, at an average rate of about 200 acres per year, suggesting continued

conversion of farmlands into the future. Therefore, the Project's contribution to this significant impact is cumulatively considerable.

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