

“C”

General Plan Consistency Analysis



A Tradition of Stewardship
A Commitment to Service

Planning, Building & Environmental Services

1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org

David Morrison
Director

To:	Chair and Members of the Planning Commission	From:	Sean Kennings Contract Planner
Date:	August 21, 2019	Re:	New Life Community Adventist Church Use Permit P16-00210-UP General Plan and Zoning Designation Consistency Analysis

I. PURPOSE:

The New Life Community Adventist Church Site is located in unincorporated Napa County, approximately one and a quarter mile east of downtown American Canyon/Highway 29 and approximately one and a half miles west of Interstate 80. The site currently contains a dilapidated single-family residence and associated site improvements owned by New Life Community Adventist Church. A review of the proposed project consistency with the Napa County General Plan is provided below. Prior to taking action on the New Life Community Adventist Church Use Permit to allow development of a church facility on an agriculture zoned parcel, the Commission must consider whether the Project is consistent with the Napa County General Plan. This memorandum provides a basis upon which the Commission could find consistency.

This memorandum also details the zoning designations covering the project site and provides a discussion and analysis of zoning consistency.

III. GENERAL PLAN CONSISTENCY ANALYSIS:

This memorandum outlines the relevant goals and policies of the County's General Plan, and analyzes whether the proposed project is consistent with the General Plan. It also details the zoning designations covering the church project and provides a discussion and zoning consistency analysis.

The New Life Community Adventist Church parcel (APN: 059-100-002) has a General Plan Designations: Agriculture, Watershed and Open Space (AWOS). The project site is considered "disturbed" as it was previously developed with a single-family residence and associated site improvements, including accessory structures, a domestic water well, and vehicle driveways and storage areas.. A permit (B18-02168) was issued on 10/26/2018 for demolition of the existing structure for security issues. The property has fallen into a general state of disrepair and the applicant would prefer to demolish the structure to avoid squatters or homeless taking refuge in the existing structure. The project site topography is gently sloping with rock outcroppings and limited mature vegetation. There are no areas specifically designated for grazing or other agriculture activities. Review of recent

historical aerial photos of the site indicate past uses involved equipment and vehicle storage consistent with the quarry operation adjacent to the subject property.

A. The Agricultural Preservation and Land Use Element:

Within the Introduction section of the Agricultural Preservation and Land Use (AG/LU) Element of the General Plan it is stated that *"The County's long history of, and close attention to, agricultural preservation and land use planning makes this a critically important Element of this General Plan. In the pages of this Element, you will find the County's policies on a wide range of issues related to the use of land, the continued viability of agriculture, and coordination with other agencies. For additional policies regarding conservation of natural areas, open space and recreation use, see the Conservation and Recreation and Open Space Elements."* (Page AG/LU-3). See the discussion under these respective element sections below.

- **Policy AG/LU-3:** The County's planning concepts and zoning standards shall be designed to minimize conflicts arising from encroachment of urban uses into agricultural areas. Land in proximity to existing urbanized areas currently in mixed agricultural and rural residential uses will be treated as buffer areas and further parcelization of these areas will be discouraged.
- **Policy AG/LU-4:** The County will reserve agricultural lands for agricultural use including lands used for grazing and watershed/open space, except for those lands which are shown on the Land Use Map as planned for urban development.

Policy AG/LU-8: The County's minimum agriculture parcel sizes shall ensure that agricultural areas can be maintained as economic units.

- **Policy AG/LU-9:** The County shall evaluate discretionary development projects, re-zonings, and public projects to determine their potential for impacts on farmlands mapped by the State Farmland Mapping and Monitoring Program, while recognizing that the state's farmland terminology and definitions are not always the most relevant to Napa County, and shall avoid converting farmland where feasible.
- **Policy AG/LU-12:** No new non-agricultural use or development of a parcel located in an agricultural area shall be permitted unless it is needed for the agricultural use of the parcel, except as provided in Policies AG/LU-2, AG/LU-5, AG/LU-26, AG/LU-44, AG/LU-45, and ROS-1.
- **Policy AG/LU-15.5:** Where proposed residential, commercial or industrial development abuts lands devoted to agriculture production, the non-agricultural uses shall be required to incorporate buffer areas to mitigate potential land use conflicts as conditions of approval for subdivision or use permit. The type and width of buffer areas shall be determined based on the character, intensity and sensitivity of the abutting land uses.

- **Policy AG/LU-20:** The following standards shall apply to lands designated as Agriculture, Watershed, and Open Space on the Land Use Map of this General Plan.

Intent: To provide areas where the predominant use is agriculturally oriented; where watersheds are protected and enhanced; where reservoirs, floodplain tributaries, geologic hazards, soil conditions, and other constraints make the land relatively unsuitable for urban development; where urban development would adversely impact all such uses; and where the protection of agriculture, watersheds, and floodplain tributaries from fire, pollution, and erosion is essential to the general health, safety, and welfare.

General Uses: Agriculture, processing of agricultural products, single-family dwellings.

Minimum Parcel Size: 160 acres, except that parcels with a minimum size of 2 acres may be created for the sole purpose of developing farm labor camps by a local government agency authorized to own or operate farm labor camps, so long as the division is accomplished by securing the written consent of a local government agency authorized to own or operate farm labor camps that it will accept a conveyance of the fee interest of the parcel to be created and thereafter conveying the fee interest of such parcel directly to said local government agency, or entering into a long-term lease of such parcels directly with said local government agency.

Every lease or deed creating such parcels must contain language ensuring that if the parcel is not used as a farm labor camp within three years of the conveyance or lease being executed or permanently ceases to be used as a farm labor camp by a local government agency authorized to develop farm labor camps, the parcel will automatically revert to, and merge into, the original parent parcel.

Maximum Building Intensity: One dwelling per parcel (except as specified in the Housing Element). Nonresidential building intensity is non-applicable.

- **Policy AG/LU-22:** Urban uses shall be concentrated in the incorporated cities and town and designated urbanized areas of the unincorporated County in order to preserve agriculture and open space, encourage transit-oriented development, conserve energy, and provide for healthy, “walkable” communities..
- **Policy AG/LU-26:** The County will discourage proposed urban developments which require urban services outside of existing urbanized areas. However, nothing in this Agricultural Preservation and Land Use Element is intended to preclude the construction of a single-family residence, on an existing, vacant, legal parcel of land in compliance with adopted County ordinances and other applicable regulations, except on designated park land. Pursuant to State law, small child care centers are considered residential uses. Where maximum dwelling unit densities are specified in this General Plan, the population density is determined by multiplying

the allowable number of dwelling units times the average persons per household in the unincorporated County as determined by the most recent U.S. Census.

- **Policy AG/LU-124:** New churches or institutions providing religious instruction shall not be located within proximity to an airport, unless they are located in an area where residential uses would be compatible under the applicable Airport Land Use Compatibility Plan.
- **Policy AG/LU-125:** New churches or other religious institutions should generally be located within or adjacent to urbanized areas, minimizing the transportation needs of parishioners/members and the potential for loss of agricultural lands.

Analysis: The project area is not within any areas that have been mapped by the State as Prime or Important farmland but instead is designated "Other Land" (X) by the Farmland Mapping and Monitoring Program of the California Resource Agency (*Napa County Important Farmland 2012 Map*, California Department of Conservation, Division of Land Resource Protection). The subject property is located outside the urban development area designated in the General Plan Land Use Map but is adjacent to residential and school uses located within the community of American Canyon. The project site currently has utilities and services and would not require new utility infrastructure to service the site.

The project would not displace agriculture or remove agricultural lands from agricultural use because the project will be located in an area that has already been disturbed and has little agricultural value. Over half of the property is characterized by rock outcroppings and slopes falling away towards American Canyon Road. While the project itself does not currently support agricultural land uses, it is not anticipated that the project will result in adverse effects to those parcels that currently or in the foreseeable future to support agriculture because less than half an acre of the property has suitable topography for agriculture or grazing production. .. The subject property is currently developed with a dilapidated single-family residence and existing services, including driveway and parking areas, a domestic water well, and electrical and gas utilities. No new utility services would be required to facilitate development of the proposed project. At 1.8-acres, the parcel size is below the current standard for AWOS zoned agriculture parcels (40- and 160-acre minimums) and most of the property is characterized as rock outcroppings. The proposed church development would only feature services on Saturdays with some office uses during the week. The church development would be replacing a residential use on an agriculturally zoned property and would not include converting an undeveloped parcel. Although Policy AG/LU-12 precludes the development/conversion of agriculture parcels for other uses, the subject property is undersized, has poor topography, and would appear unsuited for production of a viable agriculture operation. Furthermore, the property is adjacent to the City of American Canyon, has existing services, and would not require significant public improvements or services to facilitate new development. Overall, the development intensity and daily activity would be less impactful than a full time single-family residential use. Proposed as part of the project, a left-turn lane for

access off American Canyon Road would reduce any potential traffic or circulation impacts to less than significant thus reducing any potential transportation needs.

Conclusion: Mostly consistent.

B. The Circulation Element:

- **Policy CIR-16:** The County shall seek to maintain an adequate level of service on roads and at intersections as follows. The desired level of service shall be measured at peak hours on weekdays.
 - The County shall seek to maintain an arterial LOS D or better on all county roadways, except where maintaining this desired level of service would require the installation of more travel lanes than shown on the Circulation Map.
 - The County shall seek to maintain a LOS D or better at all signalized intersections, except where the level of service already exceeds this standard (i.e., LOS E or F) and where increased intersection capacity is not feasible within the existing right-of-way.
 - No single level of service standard is appropriate for unsignalized intersections, which shall be evaluated on a case-by case basis to determine if signal warrants are met.
- **Policy CIR-19:** Applicants proposing new discretionary development projects with the potential to significantly affect traffic operations shall be required to prepare a traffic analysis prior to consideration of their project by the County and shall be required to mitigate project impacts and to pay their fair share of countywide cumulative traffic improvements based on their contribution to the need for these improvements.

Analysis: A traffic analysis has been prepared for the project and incorporated into the Initial Study / Mitigated Negative Declaration, in which the finding has been presented to the Commission for its consideration. The traffic levels associated with intersections studied in the traffic analysis are expected to continue to operate at the same level of service as they do under existing conditions, with no potential impacts to AM/PM peak hour traffic trips during the week. The church anticipates one weekend service where anticipated traffic trips required the development of an east-bound left turn lane. This condition has been incorporated into the project description and would reduce potential vehicular impacts.

Conclusion: Consistent.

C. The Community Character Element:

Cultural Resources

- **Goal CC-4:** Identify and preserve Napa County's irreplaceable cultural and historic resources for present and future generation to appreciate and enjoy.
- **Policy CC-19:** The County supports the identification and preservation of resources from the County's historic and prehistoric periods.

- **Policy CC-23:** The County supports continued research into and documentation of the county's history and prehistory, and shall protect significant cultural resources from inadvertent damage during grading, excavation, and construction activities.

Analysis: Based on specific on-site studies, cultural and historic resources were not identified within the project area. Incorporation of standard conditions to ensure any discovered resources during operations are protected would protect any potential unknown resources that could be discovered during development of the project.

Conclusion: Consistent.

Noise

- **Policy CC-38:** The following are the County's standards for maximum exterior noise levels for various types of land uses established in the County's Noise Ordinance. Additional standards are provided in the Noise Ordinance for construction activities (i.e., intermittent or temporary noise).

EXTERIOR NOISE LEVEL STANDARDS (LEVELS NOT TO BE EXCEEDED MORE THAN 30 MINUTES IN ANY HOUR)

Land Use Types	Time Period	Noise Level (dBA) by Noise Zone Classification		
		Rural	Suburban	Urban
Single-Family Homes and Duplexes	10 p.m. to 7 a.m.	45	45	50
	7 a.m. to 10 p.m.	50	55	60
Multiple Residential 3 or More Units Per Building (Triplex +)	10 p.m. to 7 a.m.	45	50	55
	7 a.m. to 10 p.m.	50	55	60
Office and Retail	10 p.m. to 7 a.m.	60		
	7 a.m. to 10 p.m.	65		
Industrial and Wineries	Anytime	75		

- For the purposes of implementing this policy, standards for residential uses shall be measured at the housing unit in areas subject to noise levels in excess of the desired levels shown above.

- b) Industrial noise limits are intended primarily for use at the boundary of industrial zones rather than for noise reduction at the industrial use.
 - c) Where projected noise levels for a given location are not included in this Element, site-specific noise modeling may need to be conducted in order to apply the County's Noise policies.
- Policy CC-39: The following are noise compatibility guidelines for use in determining the general compatibility of planned land uses:

NOISE COMPATIBILITY GUIDELINES
(EXPRESSED AS A 24-HOUR DAY-NIGHT AVERAGE OR LDN)

Land Use	Completely Compatible	Tentatively Compatible	Normally Incompatible	Completely Incompatible
<i>Residential</i>	<i>Less than 55 dBA</i>	<i>55-60 dBA</i>	<i>60-75 dBA</i>	<i>Greater than 75 dBA</i>
<i>Commercial</i>	<i>Less than 65 dBA</i>	<i>65-75 dBA</i>	<i>75-80 dBA</i>	<i>Greater than 80 dBA</i>
<i>Industrial</i>	<i>Less than 70 dBA</i>	<i>70-80 dBA</i>	<i>80-85 dBA</i>	<i>Greater than 85 dBA</i>

See Policy CC-43 for the definitions of these four levels of compatibility.

- Policy CC-42: The following are the County's standards for acceptable indoor intermittent noise levels for various types of land uses. These standards should receive special attention when projects are considered in "Tentatively Compatible" or "Normally Incompatible" areas as determined by Policies CC-39 and CC-43, and new uses shall incorporate design features to ensure that these standards are met.

INTERIOR NOISE LEVEL CRITERIA FOR INTERMITTENT NOISE

Land Use Type	Acceptable Noise Level (dBA CNEL)
Residential (Single- and Multi-Family)	
Living Areas, Daytime	60 dBA
Living Areas, Nighttime	55 dBA
Sleeping Areas	45 dBA
School Classrooms or Library	55 dBA
Church Sanctuary	45 dBA
Commercial, Educational, Office, Light and Heavy Industrial, Warehousing	Conform with applicable state and federal workplace safety standards

Note: Standards for public schools are set and enforced by the State of California and are not regulated by the County.

- Policy CC-43: The following definitions shall be used in combination with the standards in the Noise Compatibility Guidelines shown above.

- a) "Completely Compatible" means that the specified land use is satisfactory and both the indoor and outdoor environments are pleasant.
- b) "Tentatively Compatible" means that noise exposure may be of concern, but common building construction practices will make the indoor living environment acceptable, even for sleeping quarters, and the outdoor environment will be reasonably pleasant.
- c) "Normally Incompatible" means that noise exposure warrants special attention, and new construction or development should generally be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. Careful site planning or exterior barriers may be needed to make the outdoor environment tolerable.
- d) "Completely Incompatible" means that the noise exposure is so severe that new construction or development should generally not be undertaken.

Analysis: The project site is located adjacent to American Canyon Road, a major arterial road connecting the City of American Canyon to Interstate 80 to the east in an area of the County that experiences higher noise levels due to proximity to. Although the proposed use would be an increase of daily activities over the existing vacant condition of the property, the project size and proposed church service schedule (only on Saturdays) would not contribute substantially to the environment that make up the areas ambient noise characteristics. An evaluation of the current noise baseline has been included as part of the environmental review of the project and standard conditions of approval have been included to reduce potential noise impacts on adjacent uses so that long-term operational noise, including mobile equipment related noises, would not result in the exposure of persons to or generate noise levels in excess of applicable standards, or substantial temporary increases in ambient noise levels in the vicinity of the project. It is anticipated that noise levels associated with the operation would not typically exceed 50dBA L₅₀ within the surrounding community, which would be consider compatible with surrounding uses and within the interior noise level criteria.

Conclusion: Consistent.

D. The Conservation Element:

Within the Conservation (CON) Element of the General Plan the managed production of resources is specifically identified and addressed through specific Goals and Policies.

Natural Resources

- **Goal CON 2:** Maintain and enhance the existing level of biodiversity.
- **Goal CON-3:** Protect the continued presence of special status species, including special-status plants, special-status wildlife, and their habitats, and comply with all applicable state, federal, or local laws or regulations.

- **Goal CON-5:** Protect connectivity and continuous habitat areas for wildlife movement.
- **Policy CON-11:** The County shall maintain and improve fisheries habitat through a variety of appropriate measures, including: Control sediment production from mines, roads, development projects, agricultural activities, and other potential sediment sources.
- **Policy CON-13:** The County shall require that all discretionary residential, commercial, industrial, recreational, agricultural, and water development projects consider and address impacts to wildlife habitat and avoid impacts to fisheries and habitat supporting special-status species to the extent feasible. Where impacts to wildlife and special-status species cannot be avoided, projects shall include effective mitigation measures and management plans including provisions to:
- **Policy CON-16:** The County shall require a biological resources evaluation for discretionary projects in areas identified to contain or potentially contain special-status species based upon data provided in the Baseline Data Report (BDR), California Natural Diversity Database (CNDDB), or other technical materials. This evaluation shall be conducted prior to the approval of any earthmoving activities. The county shall also encourage the development of programs to protect special-status species and disseminate updated information to state and federal resource agencies.
- **Policy CON-17:** Preserve and protect native grasslands, serpentine grasslands, mixed serpentine chaparral, and other sensitive biotic communities and habitats of limited distribution. The county, in its discretion, shall require mitigation that results in the following standards:
- **Policy CON-18:** To reduce impacts on habitat conservation and connectivity: The county shall require discretionary projects to retain movement corridors of adequate size and habitat quality to allow for continued wildlife use based on the needs of the species occupying the habitat.

Analysis: Because the subject property had been previously developed with residential buildings there are few anticipated impacts to biological characteristics and resources of the site and surrounding areas. Biological surveys have been conducted for the site and mitigation has been incorporated to protect special-status species that have been identified within the project area or have the potential to occur within or adjacent to the project area. Although no species have been identified on site, mitigation measures have been incorporated such that pre-construction surveys will be required prior to issuance of certain permits.

Impacts to potential off-site habitats will be minimized through ongoing maintenance of a Storm Water Pollution Prevention Plan (SWPPP) required by the San Francisco Regional Water Quality Control Board (SFRWQCB), mitigation, conditions, and the County's Stormwater Ordinance. The SWPPP utilizes specific site design and treatment control Best Management Practices (BMPs) to control on-site erosion and protect water quality.

Conclusion: Consistent.

Water Resources

- **Goal CON-9:** Control urban and rural storm water runoff and related non-point source pollutants, reducing to acceptable levels pollutant discharges from land-based activities throughout the County.
- **Goal CON-10:** Conserve, enhance and manage water resources on a sustainable basis to attempt to ensure that sufficient amounts of water will be available for the uses allowed by this General Plan, for the natural environment, and for future generations.
- **Goal CON-11:** Prioritize the use of available groundwater for agricultural and rural residential uses rather than for urbanized areas and ensure that land use decisions recognize the long term availability and value of water resources in Napa County.
- **Policy CON-47:** The County shall comply with applicable Water Quality Control/Basin Plans as amended through the Total Maximum Daily Load (TMDL) process to improve water quality. In its efforts to comply, the following may be undertaken:
 - e) Ensuring continued effectiveness of the National Pollution Discharge Elimination System (NPDES) program and storm water pollution prevention.
- **Policy CON-48:** Proposed developments shall implement project-specific sediment and erosion control measures (e.g., erosion control plans and/or stormwater pollution prevention plans) that maintain pre-development sediment erosion conditions or at minimum comply with state water quality pollution control (i.e., Basin Plan) requirements and are protective of the County's sensitive domestic supply watersheds. Technical reports and/or erosion control plans that recommend site-specific erosion control measures shall meet the requirements of the County Code and provide detailed information regarding site specific geologic, soil, and hydrologic conditions and how the proposed measure will function.
- **Policy CON-53:** The County shall ensure that the intensity and timing of new development are consistent with the capacity of water supplies and protect groundwater and other water supplies by requiring all applicants for discretionary projects to demonstrate the availability of an adequate water supply prior to approval. Depending on the site location and the specific circumstances, adequate demonstration of availability may include evidence or calculation of groundwater availability via an appropriate hydrogeologic analysis or may be satisfied by compliance with County Code "fair-share" provisions or applicable State law. In some areas, evidence may be provided through coordination with applicable municipalities and public and private water purveyors to verify water supply sufficiency.
- **Policy CON-55:** The County shall consider existing water uses during the review of new water uses associated with discretionary projects, and where hydrogeologic studies have shown that

the new water uses will cause significant adverse well interference or substantial reductions in groundwater discharge to surface waters that would alter critical flows to sustain riparian habitat and fisheries or exacerbate conditions of overdraft, the County shall curtail those new or expanded water uses.

Analysis: Water Quality - The Project will comply with requirements of the San Francisco Regional Water Quality Control Board (SFRWQCB) through preparation and maintenance of a Stormwater Pollution Prevention Plan (SWPPP) that includes the incorporation of source control, site design, and treatment control Best Management Practices (BMPs) to control on-site erosion and pollutants to protect water quality. The operator/permittee will be required through the SWPPP and County Stormwater Management Ordinance to implement BMPs and best available control stormwater management principles during project construction and ongoing operations.

Analysis: Water Supply – Groundwater use was evaluated through a Water Availability Analysis which concluded that maximum annual groundwater use provision for the project would be less than the use demands for the existing single-family residential. The project is not anticipated to impact existing groundwater/aquifer recharge and would not deplete available resources because its use would be less than the evaluated usage for the single-family residence the on the property. According to Napa County environmental resource mapping (Water Deficient Areas/Storage Areas), the project site is not located within a water deficient area and the County is not aware of, nor has it received any reports of groundwater deficiencies in the area. Because the projected water demand for the project is below the estimated groundwater availability acre feet per year for the parcel, the requested Use Permit is consistent with General Plan Goals CON-10 and CON-11, as well as, the policies mentioned above that support reservation and sustainable use of groundwater for agricultural and related purposes. The project will not require a new water system or other improvements and will not have a negative impact on local groundwater.

Conclusion: Consistent.

Climate Protection and Environmental Health

- **Goal CON-15:** Reduce emissions of local greenhouse gases that contribute to climate change.
- **Goal CON-17:** Reduce air pollution and reduce local contributions to regional air quality problems, achieving and maintaining air quality in Napa County which meets or exceeds state and federal standards.
- **Policy CON-65:** The County shall support efforts to reduce and offset GHG emissions and strive to maintain and enhance the County's current level of carbon sequestration functions through the following measures:
 - b. Preserve and enhance the values of Napa County's plant life as carbon sequestration systems to recycle greenhouse gases.

- e. Consider GHG emissions in the review of discretionary projects. Consideration may include an inventory of GHG emissions produced by the traffic expected to be generated by the project, any changes in carbon sequestration capacities caused by the project, and anticipated fuel needs generated by building heating, cooling, lighting systems, manufacturing, or commercial activities on the premises. Projects shall consider methods to reduce GHG emissions and incorporate permanent and verifiable emission offsets.
- **Policy CON-66:** The County shall promote the implementation of sustainable practices and green technology in agriculture, commercial, industrial, and residential development through the following actions:
 - a.2) Minimize, reuse, and recycle construction-related waste.
 - a.3) Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.
- **Policy CON-77:** All new discretionary projects shall be evaluated to determine potential significant project-specific air quality impacts and shall be required to incorporate appropriate design, construction, and operational features to reduce emissions of criteria pollutants regulated by the state and federal governments below the applicable significance standard(s) or implement alternate and equally effective mitigation strategies consistent with BAAQMD's air quality improvement programs to reduce emissions.
- **Policy CON-80:** The County shall seek to reduce particulate emissions and avoid exceedances of state particulate matter (PM) standards by:
 - e. Requiring implementation of dust control measures during construction and grading activities and enforcing winter grading deadlines.

Analysis: The Project is anticipated to result in minor Greenhouse Gas (GHG) and other emissions, including particulate matter, which affects air quality through project construction operations. Implementation of standard project conditions would ensure operational emissions that contribute to GHG and other emissions, including particulate matter, which are detrimental to air quality and associated health risks would be substantially reduced to less than significant levels.

Conclusion: Consistent.

H. Measure P (Formally Measure J)

For the reasons detailed above the proposed project would be consistent with the properties General Plan Land Use and Zoning Designations, and therefore a general plan land use and/or a zoning designation change is not necessary to accommodate the Project. As such, the provisions of Measure P are not triggered and do not apply.

IV. ZONING CONSISTENCY

The zoning districts that covers the New Life Church project site is Agricultural Watershed (AW). The intent of the Agricultural Watershed designation is to provide in those areas of the county where the

predominant use is agriculturally oriented, where watershed areas, reservoirs and floodplain tributaries are located, where development would adversely impact on all such uses (Napa County Code Section 18.20.010.). The project site is currently developed with residential uses and does not have agriculture related uses on site.

Pursuant to Napa County Code (NCC) Section 18.120.010(B)(11) (Exceptions to use limitations) the development of church facility may be permitted in any zoning district upon the granting of a use permit. Furthermore, the site is designated at "Other Land (X) by the Farmland Mapping and Monitoring Program of the California Resource Agency and is not considered prime farmland or important farmland. Therefore, the granting of a Use Permit would not be removing existing agriculture uses or reducing potential agriculture producing areas.