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**Planning, Building & Environmental Services**

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**David Morrison**  
Director

February 7, 2018

Patrick Sweeney, Superintendent  
Napa Valley Unified School District  
1616 Lincoln Avenue  
Napa, CA 94558

**Re: General Plan analysis regarding possible acquisition of 5266 Old Sonoma Road, Assessor's Parcel Number 047-110-018, for relocation of the existing Stone Bridge Charter elementary school.**

Dear Mr. Sweeney:

Thank you for providing the County with the notification letter (dated January 4, 2018) stating your intent to potentially acquire the new parcel. We appreciate the opportunity to review and offer comments.

In compliance with Public Resources Code Section 21151.2 and Government Code Section 65402, this General Plan Consistency Analysis is intended to determine if using the parcel for a school is consistent with the policies of the Napa County General Plan and to provide input to the School Board as to the acquisition of the property.

At the February 7, 2018, Napa County Planning Commission hearing, the Planning Commission reviewed and discussed the attached Staff Report. The Planning Commission directed staff to prepare this letter and present the findings of the analysis. Attached as Exhibit A is a complete analysis of the County General Plan policies that are relevant to the proposed school site.

In addition to the General Plan Consistency analysis, the County provides a list of topics that should be considered during the environmental analysis and to alert you to the potential need to obtain County permits for some components of the development and site improvements.

Sincerely,

David Morrison  
Director

## Exhibit A

### General Plan Consistency Analysis NVUSD Proposed Relocation of Stone Bridge Elementary School

#### Zoning and Land Use Designations

Criteria	Designation	General Uses
General Plan Designation	Agricultural Resource (AR) AG/LU-21	Agriculture, processing of agricultural products, single-family dwellings.
Zoning Code	Agricultural Watershed (AW) County Code Section 18.20.010*	Agricultural, residential development, wineries. *See County Code for complete list of permitted uses

#### Site and Surrounding Property Characteristics

Property	Existing Development	General Plan Designation	Zoning District
<b>Proposed School Site</b>			
5266 Old Sonoma Road, Napa  APN: 047-110-018  7.66 acres	Currently vacant, but was a residential development. Demolition of the residential and accessory structures and the septic system occurred in December 2017.	AR	AW
<b>Surrounding Development</b>			
North:	Rural residences and agricultural parcels (vineyards)	AR	AW
South and directly East:	Carneros Inn Resort	AR	AW; CL; PD
East:	Agricultural parcels east of Carneros Inn Resort	AR	AW
West:	Rural residences and Wright Corner (limited commercial) at the intersection of Old Sonoma Road and Old Sonoma Hwy  Nearest Residence - approximately 175 feet from the western property line	AR	AW and CL (Wright Corner property)

Property	Existing Development	General Plan Designation	Zoning District
Existing School Site			
1680 Los Carneros Avenue, Napa  APN: 047-182-011  9.78 acres	School, associated development, gardens	AR	AW:AC
Additional Zoning Districts: CL - Commercial Limited; PD - Planned Development; AW:AC - Agricultural Watershed: Airport Compatibility Overlay			

**General Plan Goals & Policies: Agricultural Preservation and Land Use Schools and Churches**

Relevant Napa County General Plan Policies	Consistency/Considerations
<p><u>Policy AG/LU-120:</u> The County shall work with the school districts serving students in the County to coordinate the provision of school facilities in conjunction with demographic changes and student populations. The County shall also encourage incorporated jurisdictions to reserve school sites within their boundaries.</p>	<p>NVUSD is proposing to relocate the existing school due to seismic hazards on the existing site.</p> <p>The existing school facility is approximately 1.7 miles to the south of the proposed site. It is staff’s understanding that the relocated school would continue to serve the same student body and general population.</p>
<p><u>Policy AG/LU-121:</u> The County shall coordinate an exchange of information with the school districts regarding school needs and new residential developments in the unincorporated area.</p>	<p>N/A – This analysis is not related to a new residential development.</p>
<p><u>Policy AG/LU-122:</u> The County shall consider school districts’ proposed school sites in relation to:</p>	
<p>a) General Plan designations.</p>	<p>Inconsistent.</p> <p>AR designation: Agriculture, processing of agricultural products, single-family dwellings. (See Policy AG/LU-21 below.)</p>

Relevant Napa County General Plan Policies	Consistency/Considerations
	A school use is not among those listed as general uses for the site’s designation.
b) Geology and seismic considerations, topography, drainage, soils.	<p>Potentially Consistent.</p> <p>The proposed site is not located on mapped fault. The property is a relatively flat site. Soils and drainage should be evaluated prior to site development to determine if they are adequate for the proposed school use.</p>
c) Location and general utility of land; population distribution.	<p>The site is currently vacant, but was developed with a residence, accessory structures, septic system, well, associated residential development, and contains an irrigation pond. The remainder of the property is undeveloped.</p> <p>The buildings and septic system were demolished in December 2017, and a new well was drilled in March 2017.</p> <p>Residential development in the surrounding area is limited and consists of rural residences on parcels ranging in size from approximately 0.2 acres to 45 acres. The existing school facility is approximately 1.7 miles to the south of the proposed site.</p> <p>It is staff’s understanding that the relocated school would continue to serve the same student body and general population.</p>
d) Access, transportation facilities, utilities.	<p>Inconsistent as to traffic.</p> <p>Old Sonoma Road is a major commute road, serving a limited number of residences and agricultural properties on the road. There are no acceleration/deceleration lanes, which could aid with access entering and existing the site, in the vicinity of the proposed school site.</p>

Relevant Napa County General Plan Policies	Consistency/Considerations
	<p>The addition of the school could result in levels of traffic inconsistent with the current rural agricultural uses. There are no sidewalks or bicycle lanes on Old Sonoma Road, therefore the location is not conducive to pedestrian and/or non-vehicular traffic.</p> <p>County staff has not recently studied the roadway, but with the added trips associated with the proposed school, it is expected that operations would deteriorate slightly, and therefore recommend a detailed traffic analysis. Dependent on the resulting level of traffic, installation of a left-turn lane may be required.</p> <p>Potentially Inconsistent as to the water system and septic system.</p> <p>The school would be required to install a septic system and public water system. These systems would be regulated through the County Environmental Health Division or the State Water Resources Control Board.</p> <p>The area is known to have groundwater deficiencies and water quality issues. Other County projects in this area have been subject to preparation of a Water Availability Analysis, including a groundwater recharge analysis.</p> <p>The school should confirm the current well construction is in compliance with water system requirements and provide the results of a well yield test to demonstrate adequate water supplies are available to serve the project.</p>

Relevant Napa County General Plan Policies	Consistency/Considerations
<p>e) Conflicting or hazardous conditions (e.g., noise, traffic).</p>	<p>Potentially Inconsistent.</p> <p>As noted in item d) above, the addition of the school could result in an increase in traffic and back-ups on the road, which could pose hazards to school employees and students as well as local residents and commuters.</p> <p>County staff recommends a detailed traffic analysis, including a study of the existing conditions of the transportation network. Dependent on the resulting level of traffic, installation of a left-turn lane may be required.</p> <p>The school would be subject to the noise resulting from the traffic on the road.</p>
<p>f) Protection of agricultural lands.</p>	<p>Inconsistent</p> <p>Based on policies in the Napa County General Plan, school should generally be located in areas designated for urban development.</p> <p>The use of the property as a school would convert agricultural land to a non-agricultural use.</p> <p>The proposed school site could potentially impact the surrounding, existing agricultural uses. The closest vineyards are located on the parcel directly north of the property across Old Sonoma Road. Growers within a quarter mile of the school will need to comply with new regulations regarding notification and timing of pesticide used. Adjacent agricultural factors such as dust, noise, and odors may travel from operations and would be protected by the County's Right to Farm Ordinance.</p>

Relevant Napa County General Plan Policies	Consistency/Considerations
	<p>The existing school site is also on agricultural land. The future use of the existing school site has not been confirmed by NVUSD, but with the relocation of the school, there is potential for 9.78 acres to be returned to an agricultural use to offset the conversion.</p>
<p>The results of the review are to be forwarded to the appropriate school district board within 30 days from the receipt of the referral.</p>	<p>The notification letter (dated January 4, 2018) was received on January 11, 2018. The recommendation will be forwarded to the NVUSD following the February 7, 2018, Planning Commission Hearing within the 30 day referral period.</p>
<p><u>Policy AG/LU-123:</u> The County shall establish general school site location criteria such as:</p>	
<p>a) New school facilities shall not be located within two miles of an airport unless approved by the State Department of Education.</p>	<p>Consistent</p> <p>The property is approximately 3.8 miles from the Napa Valley Airport property boundary and 1.25 miles from the outer boundary of Airport Compatibility Zone E. There are no airport related concerns or issues.</p>
<p>b) School facilities shall, whenever practical, be located in areas designated in the appropriate general plan for urban development.</p>	<p>Inconsistent</p> <p>The proposed school use is not among those listed as general uses for the site’s general plan designation and would convert agricultural lands to a non-agricultural use.</p> <p>AR designation: Agriculture, processing of agricultural products, single-family dwellings. (See Policy AG/LU-21 below.)</p> <p>The existing school is located approximately 1.7 miles south of the proposed site and is also on agricultural land. The future use of the</p>

Relevant Napa County General Plan Policies	Consistency/Considerations
	existing school site has not been confirmed by NVUSD, but with the relocation of the school, there is potential for 9.78 acres to be returned to an agricultural use to offset the conversion.
c) Coordinate County plans and ordinances to be supportive of school use and to minimize the need for busing students.	<p>Potentially Inconsistent – No change from existing conditions</p> <p>Residential development in the nearby area is limited and consists of rural residences on large parcels.</p> <p>It is staff’s understanding that the relocated school would continue to serve the same student body and general population. It is anticipated that continued busing in of students from cities and other neighborhoods will be necessary.</p> <p>Old Sonoma Road is a major commuter road, serving a limited number of residences and agricultural properties on the road. There are no sidewalks on Old Sonoma Road, therefore the location is not conducive to pedestrian traffic.</p>
d) Ensure that proposals for multi-family housing or multiple-lot subdivisions within the unincorporated area are evaluated to determine their impact on schools and are modified to address potential impacts, including the need for new facilities, if any.	Not applicable to this analysis.

**Additional General Plan Goals & Policies Related to Agricultural Preservation and Land Use**

<p><b>Napa County General Plan Goals &amp; Policies - Agricultural Preservation and Land Use</b></p>
<p><u>Goal AG/LU-1:</u> Preserve existing agricultural land uses and plan for agriculture and related activities as the primary land uses in Napa County.</p>



<p><b>Napa County General Plan Goals &amp; Policies - Agricultural Preservation and Land Use</b></p>
<p><u>Goal AG/LU-2:</u> Concentrate urban uses in the County’s existing cities and town and urbanized areas.</p>
<p><u>Policy AG/LU-2:</u> “Agriculture” is defined as the raising of crops, trees, and livestock; the production and processing of agricultural products; and related marketing, sales and other accessory uses. Agriculture also includes farm management businesses and farm worker housing.</p>
<p><u>Policy AG/LU-4:</u> 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.</p>
<p><u>Policy AG/LU-12:</u> 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.</p>
<p><u>Policy AG/LU-15:</u> The County affirms and shall protect the right of agricultural operators in designated agricultural areas to commence and continue their agricultural practices (a “right to farm”), even though established urban uses in the general area may foster complaints against those agricultural practices. The “right to farm” shall encompass the processing of agricultural products and other activities inherent in the definition of agriculture provided in Policy AG/LU-2, above.</p> <p>The existence of this “Right to Farm” policy shall be indicated on all parcel maps approved for locations in or adjacent to designated agricultural areas and shall be a required disclosure to buyers of property in Napa County.</p>
<p><u>Policy AG/LU-20:</u> The following standards shall apply to lands designated as Agricultural Resources on the Land Use Map of this General Plan.</p> <p>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.</p> <p>General Uses: Agriculture, processing of agricultural products, single- family dwellings.</p>

**Napa County General Plan Goals & Policies - Agricultural Preservation and Land Use**

Policy AG/LU-21:

The following standards shall apply to lands designated as Agricultural Resource on the Land Use Map of this General Plan.

Intent: To identify areas in the fertile valley and foothill areas of the county in which agriculture is and should continue to be the predominant land use, where uses incompatible with agriculture should be precluded, and where the development of urban type uses would be detrimental to the continuance of agriculture and the maintenance of open space which are economic and aesthetic attributes and assets of the County of Napa.

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

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.

DRAFT

### **Other Considerations/Potential Impacts:**

The following are a preliminary list of topics that should be considered and analyzed if NVUSD proceeds with the land acquisition.

Agricultural Impacts – The use of the property as a school would convert agricultural land to a non-agricultural use and remove the use of the land for agriculture and processing of agricultural products, two of the primary uses associated with the Agricultural Resource designation. The proposed school site is not subject to an Agricultural Land Conservation Contract under the provision of Williamson Act. See the Reviewing Agency/Department Comments for additional information provided by the County Agricultural Commissioner.

Hydrology – Carneros Creek is located approximately 1,000 feet to the west of the property. An evaluation of the modified site drainage should ensure no impacts to the creek. There is a 0.14-acre pond on the southern portion of the property. The pond shows up on the National Wetlands Inventory Map as a “Permanently flooded pond, excavated” (PUBHx) fresh water pond. Use of or conversion of the pond should be evaluated and any necessary permits should be obtained through the State.

Water Availability (Quantity/Quality) – The area is known to have groundwater deficiencies and water quality issues. Other County projects in this area have been subject to preparation of a Water Availability Analysis, including a groundwater recharge analysis.

County discretionary projects are required to comply with General Plan Conservation Policies CON-53 and CON-55, requiring that applicants prove that adequate water supplies are available to serve the proposed use without causing significant negative impacts to shared groundwater resources. Evidence should be provided that adequate water supply and service is available.

See the Reviewing Agency/Department Comments for additional information provided the County Environmental Health Division.

Traffic/Circulation – Old Sonoma Road is a major commuter road, serving a limited number of residences and agricultural properties on the road. The addition of the school could result in levels of traffic inconsistent with the current rural agricultural uses. There are no sidewalks on Old Sonoma Road, therefore the location is not conducive to pedestrian and/or non-vehicular traffic. Because the road is primarily a commuter road an analysis should be considered on whether pedestrian and/or non-vehicular access is recommended along the road. The existing shoulders may be able to accommodate the addition of bike lanes. There are no

acceleration/deceleration lanes along the road. The addition of these areas would require shifting the road lanes, which would result in reduced shoulders. Dependent on the resulting level of traffic, installation of a left-turn lane may be required. The additional of left-turn lanes would affect the shoulder width and the potential for other improvements along the road. See the Reviewing Agency/Department Comments for additional information provided by the County Public Works Division.

**Reviewing Agency/Department Comments:**

Engineering Division – The Division provides the following comments. If Napa County were the lead agency in reviewing this project, the following information would be requested for review:

1. Any roadway, access driveway, and parking areas proposed new or reconstructed shall meet the minimum design requirements for a commercial, industrial and non-residential driveway as defined in the latest edition of the Napa County Road & Street Standards.
2. All on site civil improvements including but not limited to the excavation, fill, general grading, drainage, curb, gutter, surface drainage, storm drainage, parking and drive isles, shall be constructed according to plans prepared by a registered civil engineer in the State of California.
3. The developer shall obtain an encroachment permit prior to any work performed within the Napa County right-of-way.
4. Grading and drainage improvements shall be constructed according to the current Napa County Road and Street Standards, Chapter 16.28 [& Chapter 18.108.027] of the Napa County Code, and Appendix J of the California Building Code.
5. All earth disturbing activities shall include measures to prevent erosion, sediment, and waste materials from leaving the site and entering waterways both during and after construction in conformance with Napa County Stormwater Ordinance 1400 and the latest adopted state regulations. Best Management Practices (BMPs) shall also be implemented to minimize dust at all times.
6. Any construction activity that equals or exceeds one acre of total disturbed area shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the regulations of California Regional Water Quality Control Board (CRWQB) and shall file a Notice of Intent (NOI) prior to commencement of any construction activity. The completed SWPPP shall be submitted to the Napa County PBES Department Engineering Division for review.

7. All hazardous materials stored and used on-site during construction that could cause water pollution (e.g. motor oil, cleaning chemicals, paints, concrete, etc.) shall be stored and used in a manner that will not cause pollution, with secondary containment provided. Such storage areas shall be regularly cleaned to remove litter and debris. Any spills shall be promptly cleaned up and appropriate authorities notified.
8. All trash enclosures must be covered and protected from rain, roof, and surface drainage.
9. Proposed drainage for the development shall be shown on the improvement plans and shall be accomplished to avoid the diversion or concentration of storm water runoff onto adjacent properties. Plan shall also indicate the path and changes in runoff.
10. The proposed development shall incorporate Post-Construction Stormwater Management Measures to comply with Napa County's Stormwater Quality Ordinance and Provision E.12 of the State Water Resource Control Board Water Order No 2013-0001-DWQ - MS4 General Permit, including but not limited to site design measures, source control measures, runoff reduction, stormwater treatment, baseline hydromodification management and operation and maintenance of Post-Construction stormwater management measures.

Environmental Health Division – The Division provides the following comments:

1. A small public water system permit will be required. A water supply permit application packet must be submitted to this Division for review and approval. The results of a well yield test conducted in accordance with California Code of Regulations (CCR), Title 22, Section 64554 will have to be included with the application. A consolidation study completed in accordance with California Health and Safety Code, Section 116527 and approved by the State of California Drinking Water Program must also be included in the permit application packet.
2. The development will be served by an onsite wastewater treatment system. A site evaluation must be conducted by a qualified professional to determine type, size and location of wastewater system appropriate for the site. Plans for the wastewater system must be submitted to this Division for review and approval. If the wastewater flows exceed 5000 gallons per day, a Report of Waste Discharge will have to be submitted to the Regional Water Quality Control Board for review and approval.
3. If food service is proposed, the kitchen facilities must be approved by this Division. Plans and an annual operating permit are required.
4. If a swimming pool is proposed, the plans must be approved by this Division. An annual operating permit is required.

Public Works Department – Based on the limited information provided, if Napa County were the lead agency in reviewing this project, the following information would be requested for review:

1. A more detailed project description which includes information related to existing and proposed school location, number of students and staff at existing and proposed school, circulation and access plans for the proposed school
2. Existing vehicle counts at the existing and proposed school driveways
3. Detailed traffic study which evaluates the potential impacts on the transportation network. It is recommended that the traffic study should follow the County's traffic study guidelines and significance criteria.
4. Left turn lane warrant should be evaluated for Old Sonoma Road at project driveway intersection based on future expected volumes with the project. The County's standard left turn lane warrant standards should apply.
5. Pedestrian accessibility and safety analysis as it relates to path of travel within the County right of way.
6. Encroachment permit for any work done within the County right of way.

Agricultural Commissioner – Aside from department impacts, there are more general and specific concerns about the location of the proposed school site and its impacts on agriculture. The Division provides the following comments:

1. Growers within a quarter mile of the school will need to comply with new regulations that require annual notification by the grower to the school of all pesticides that may be used and prohibit most pesticide application from occurring between 6 am and 6 pm Monday through Friday. The Department would provide outreach to the affected growers when necessary.
2. Plant material used to landscape or provide vegetative screening/buffer protection will need to be inspected if coming from out-of-county to ensure it is free of harmful pests and diseases, such as the Glassy winged Sharpshooter. This is a onetime activity performed at the school site.
3. The school and adjacent/nearby growers will likely have to come to some shared understanding of farming activities and situations which may affect the school. Dust, noise and odors may travel from growing operations and would be protected by the County's Right to Farm Ordinance. Some of the potential impacts would be lessened

if the school was surrounded by a vegetative screen plantings that would prevent noise and dust.

CalFire – Generally the Division of the State Architect would be responsible for complying with State fire code requirements including items such as site access, sprinklers in buildings, and water storage. The Division has the option to contact the responsible fire agency to incorporate local requirements.

**Future School Proposal – Additional Details:** If NVUSD decides to move forward on the acquisition of the property topics that would be helpful for further analysis of site include:

- Detailed project description which includes information related to number of students and staff at existing and proposed school.
- Proposed site plan – building layout, parking, circulation/access plan, gardens, play areas, water storage.
- Changes in use and development between the existing and proposed site – Net increase or decrease in impacts.
- Expected use of existing school site.

**Public Notice:** On January 26, 2018, Notice of the February 7, 2018, Planning Commission Hearing was published and sent to members of the public within a 1,000-foot radius of the property.

**Public Comments:** Section reserved for comments received prior to or during the public hearing.