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NAPA COUNTY BOARD OF SUPERVISORS Board Agenda Letter

TO: Board of Supervisors
FROM: Hillary Gitelman - Director
Conservation, Development & Planning
REPORT BY: John Woodbury, Principal Planner , 259-5933
SUBJECT: Approval of and authorization for the Chair to sign a comment letter to the Bureau of Land Management regarding the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS)

RECOMMENDATION

Director of Conservation, Development and Planning and the Napa County Parks and Open Space Advisory Committee request approval of and authorization for the Chair to sign a comment letter to the Bureau of Land Management (BLM) regarding the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) concerning the management and disposition of BLM lands in Napa County.

EXECUTIVE SUMMARY

The Bureau of Land Management (BLM) is the single largest property owner in Napa County, with over 35,000 acres of land in the County. Since 1976 the Ukiah Field Office of BLM, which manages BLM lands within Napa County, has operated its holdings following the guidance of its adopted 1976 Management Framework Plan. This Framework Plan was intended to be the first step in the planning process required by the Federal Land Policy and Management Act of 1976. Nearly 30 years later, BLM has released a draft Resource Management Plan (RMP) and associated draft Environmental Impact Statement (DEIS). The RMP has many significant implications for Napa County. Once adopted, the RMP will guide BLM actions for the foreseeable future.

FISCAL IMPACT

Is there a Fiscal Impact? No

ENVIRONMENTAL IMPACT

ENVIRONMENTAL DETERMINATION: The proposed action is not a project as defined by 14 California Code of

Regulations 15378 (State CEQA Guidelines) and therefore CEQA is not applicable.

BACKGROUND AND DISCUSSION

The Bureau of Land Management (BLM) is accepting comments through December 15, 2005 on a draft Resource Management Plan (RMP) and associated environmental review (DEIS) which will guide BLM Ukiah Field Office actions for the foreseeable future. Based on review by the Napa County Parks and Open Space Advisory Committee (NCPOAC) and analysis by staff, the Director of Conservation, Development and Planning recommends the County submit comments on the following issues.

Internal Inconsistencies

The draft RMP and DEIS are extremely hard to understand, and contain numerous inconsistencies, ambiguities and data gaps. These should be corrected. To avoid unanticipated adverse impacts, a general policy statement should be included indicating that any remaining ambiguities or inconsistencies should be resolved in favor of resource conservation and low impact recreation.

Lawless Activities

The draft RMP notes numerous management problems, especially at Knoxville, related to lawless behavior. Unregulated shooting of guns, all-night partying and drinking by teenagers and young adults, and motorized recreation are the activities most closely associated with lawless behavior. Sufficient financial resources have not been identified to implement necessary management improvements. Some of the County's costs for assisting BLM with these problems have been recovered through grants, but available funding is significantly less than needed. If adequate on site supervision cannot be provided, management objectives should be reexamined, and areas impacted by pervasive illegal behavior should be considered for closure to the activities which foster the problems.

Disposal of Properties

In addition to its major holdings, BLM lands in Napa County include over two dozen scattered collections of parcels which the RMP identifies as surplus and available for disposal. No parcel specific information is presented in the documents with which to evaluate the appropriateness of disposition. BLM plans to defer detailed analysis until specific transactions are proposed. This ad hoc approach undermines the goal of having a consistent approach, hinders an understanding of potential cumulative effects, and does not assure that the benefits of any property disposal in Napa County remain within Napa County.

To protect County interests, the RMP should specify that the benefits of any disposal of surplus BLM lands within the County be retained within Napa County. In addition, the RMP should indicate that any disposition of land will be conditioned on protecting significant resource and recreational values of the affected parcels.

Public Access and Trails

The draft RMP neither acknowledges nor incorporates the public access and trail plans of other agencies and organizations. It should.

Wilderness Values

Some BLM lands which appear to have wilderness qualities are proposed to be designated as Front or Middle Country, which allows a greater level of development and more intensive uses than Primitive or Back Country, yet the associated text generally indicates minimal or no development is contemplated. Absent a compelling public purpose for the more development oriented designations, a Primitive or Back Country designation would be more appropriate for lands at Cedar Roughs, Berryessa Peak and along Blue Ridge.

Management Areas

Most of the unconnected parcels in Napa County are assigned to a Scattered Tract Management Area. This raises a concern that these parcels will continue to be neglected for the foreseeable future. Unconnected parcels in the eastern portion of Napa County would be better managed if assigned to either the Knoxville, Cedar Roughs and Berryessa Peak Management Areas. This would place management responsibilities with the same staff that is assigned to the closest primary agency holdings.

Wind Energy

Decisions about where wind energy development is allowed appear to be based exclusively on estimates of wind energy potential and anticipated market demand, with virtually no analysis of environmental impacts. Controversy over the impact of wind turbines on raptors and other birds is intense. Absent any review of these impacts, wind energy development should be excluded from BLM's Berryessa Peak and Knoxville lands.

SUPPORTING DOCUMENTS

A . Comment Letter

CEO Recommendation: Approve

Reviewed By: Andrew Carey