



A Tradition of Stewardship  
A Commitment to Service

Supplemental Item 2  
Planning, Building & Environmental Services

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

**Brian D. Bordona**  
Director

April 4, 2025

Brenden Freeman, Executive Director  
Napa County Local Agency Formation Commission (LAFCO)  
1754 Second Street, Suite C  
Napa, Ca 94559

Re: 1661 Green Island Road – Sphere of Influence Amendment Application

Dear Mr. Freeman:

Thank you for providing the County with the opportunity to review and comment on the subject application to amend the Sphere of Influence (SOI) at 1661 Green Island Road. As you may recall, a SOI Amendment application for the property was previously submitted to LAFCO in 2021, which received opposition from the County (see attached December 1, 2021, letter), agricultural and industry groups and ultimately denied by LAFCO on June 6, 2022.

In October 2023 at the annual CALAFCO conference, Napa LAFCO was recognized and celebrated with the prestigious Mike Gotch Award for Excellence in Public Service for their work in protecting agricultural and open space areas, specifically for its June 6<sup>th</sup> decision to deny the 1661 Green Island Road - SOI Amendment application. More recently in November 2024, the citizens of the City of American Canyon voted to reject Measure J, which would have expanded the City's Urban Limit Line to include the 157-acre property.

The County continues to have concerns regarding the future use of the property. Specifically, the potential conflict with the intent of County's longstanding agricultural and open space preservation policies as well as the potential adverse environmental impacts to wildlife and climate adaption. We look forward to continued conversations with the City of American Canyon to ensure our concerns are addressed with respect to future uses of the property.

Respectively,

Brian D. Bordona  
Director of Planning, Building and Environmental Services

cc: Napa County Board of Supervisors  
Ryan J. Alsop, Napa County CEO  
Sheryl Bratton, Napa County Counsel  
Jason Holley, American Canyon City Manager

Attachment: December 1, 2021, letter from County



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David Morrison  
Director

December 1, 2021

Brendon Freeman, Executive Officer  
Napa County Local Agency Formation Commission (LAFCO)  
1754 Second Street, Suite C  
Napa, California 94559

**RE: GREEN ISLAND VINEYARD SPHERE OF INFLUENCE AMENDMENT APPLICATION**

Dear Mr. Freeman:

Napa County (County) would like to express our appreciation to LAFCO Commissioners and staff for considering our critical concerns over the proposed Green Island Vineyards Sphere of Influence (SOI). This proposal seeks to amend the SOI for the City of American Canyon (City) and American Canyon Fire District (District) to include this property, which is the first step toward annexation and urbanization. This action would be in direct conflict with the City General Plan, County General Plan, adopted Memorandum of Understanding on growth boundaries between the City and County, and ultimately, LAFCO's Sphere of Influence Policy. Consideration and approval of this SOI amendment is extremely premature by designating an area for future annexation well in advance of any evaluation of the land use and environmental consequences.

The County and the cities/town have a long history of thoughtful and balanced consideration of urban boundary expansion and protection of agricultural lands. To that end, in 2008, the City and County entered into an agreement on the growth boundary for the City. Among other commitments between the agencies, the agreement set forth that the County would support certain annexations of unincorporated properties located within the growth boundary in turn for the City ensuring that additional properties beyond the boundary would not be considered for inclusion within the City prior to 2030, absent voter approval. This proposal is outside of the growth boundary described in that agreement. This proposal should not be considered until at least 2030, and not until the City has taken steps to include this site within their General Plan and various master plans for the provision of urban services. LAFCO should therefore deny this request.

The Objective of LAFCO's Sphere of Influence Policy (Section III) is to "promote the orderly expansion of cities, towns, and special districts in a manner that ensures the protection of the environment and agricultural and open space lands while also ensuring the effective, efficient, and economic provision of essential public services, including public water, wastewater, fire protection and emergency response, and law enforcement." This proposal does not conform to that objective for the following reasons:

- American Canyon's General Plan, including its plans for expansion, does not contemplate inclusion of this property within the City.
- No review of the potential environmental impacts has been conducted, and no project commitments have been put forth to ensure protection of the environment.

Green Island Vineyard SOI  
Amendment Application  
November 30, 2021

MSR or the City's General Plan and water and sewer master plans. All of these documents will require amendment/updating, including evaluation of potential environmental impacts under CEQA.

- Policy V.A.9 directs that the following land use criteria shall be considered in determining SOI's:
  - a. Land designated for agriculture and open space – The project site is designated for agricultural land use.
  - b. Consistency with the County and City General Plans – The project conflicts with County General Plan Policy AG/LU-130 which recognizes and supports the City's currently adopted urban growth boundary that does not include the subject property. The City has not taken a position to either support or oppose the SOI Amendment, and thus has not provided comments on the proposal's consistency with their General Plan. Adopted policies of affected agencies promoting infill development – As noted previously, the project conflicts with the City/County growth boundary agreement, which implements and supports both agencies General Plans and their overarching goals to direct non-agricultural development into urbanized areas and limit conversion of agricultural lands.
  - c. Amount of existing vacant or undeveloped land located within the affected agency – The applicant's submittal materials do not address this. Furthermore, the City has not taken a position to either support or oppose the SOI Amendment, and thus has not provided any information on the extent of vacant or undeveloped land within its boundaries.
  - d. Adopted urban growth boundaries – As noted previously, the project conflicts with the adopted City/County growth boundary agreement.

Please also note that Section C. of LAFCO's SOI Policy states that SOI amendments will be subject to the California Environmental Quality Act (CEQA). This policy is consistent with the State CEQA Guidelines and supporting case law. This project represents the first step toward inclusion of the property within the City of American Canyon and thus enabling its conversion to urban land uses. Should LAFCO proceed with this application, the CEQA evaluation should occur prior to any final decision. Typically, before LAFCO would see an application of this nature, the City would have prepared a thorough environmental review, (likely an Environmental Impact Report) in concert with required changes to their General Plan and facilities master plans.. Without the environmental review, LAFCO does not have sufficient information to adequately evaluate the potential impacts of this proposal.

As detailed in this letter, there is a strong and compelling argument for LAFCO to deny this request. Agriculture is the foundation of our community identity and the local economy within Napa County. Any loss of farmland needs to be carefully considered in the context of available alternatives and the cumulative effect on the larger land use strategy shared by the City, County, and LAFCO. None of this context is provided with the proposal, which instead has been provided an accelerated process that prevents the thoughtful and deliberative consideration needed when addressing incremental impacts to the future of agriculture.

Thank you for providing an opportunity to review and comment on the document. If you should have any questions regarding any of the items listed above, please feel free to contact me at 707-253-4805 or by email at [david.morrison@countyofnapa.org](mailto:david.morrison@countyofnapa.org),

Sincerely,



David Morrison

Planning, Building and Environmental Service Director

cc: Board of Supervisors  
Minh Tran, Napa County CEO  
Jason Holley, American Canyon City Manager