



AUGUST 15, 2025

VIA EMAIL: PLANNINGDEPARTMENT@CITYOFDIXONCA.GOV

RAFFI BOLOYAN, COMMUNITY DEVELOPMENT DIRECTOR

CITY OF DIXON

600 EAST A STREET

DIXON, CA 95620

Dear Raffi Boloyan:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HARVEST MASTER PLAN, SOUTHEAST ANNEXATION, AND GENERAL PLAN AMENDMENT PROJECT, SCH# 2025070838

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Harvest Master Plan, Southeast Annexation, and General Plan Amendment Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents.

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The Harvest Master Plan, Southeast Annexation, and General Plan Amendment project (Project) site comprises approximately 7,819 acres of land located in unincorporated Solano County, surrounding the City of Dixon just outside the City's existing city limits

and Sphere of Influence (SOI), and approximately 39 acres of land located within the City's Pond C stormwater drainage area. The Project proposes the following:

- Expand the City of Dixon's limits by annexing approximately 1,258 acres of unincorporated Solano County land comprised of the Harvest Project, Lombardo Ranch Project, and non-participating parcels. The Project encompasses the Harvest Master Planned Development—a phased, mixed-use community of up to 8,752 residential units, commercial/mixed-use space, public facilities, infrastructure (water, wastewater, stormwater, transportation), and extensive open space—anticipated to build out over 20–25 years. Pond C may be utilized for drainage upgrades and potential community-serving facilities.
- SOI expansion including SOI Area A (1,768 acres), SOI Area B (1,306 acres), SOI Area C (79 acres), the Harvest Project (838 acres), the Lombardo Ranch Project (147 acres), and non-participating parcels (273 acres). The Lombardo Ranch site would maintain current land-use designations pending future project application and non-participating parcels are proposed for annexation with no immediate land-use changes. Proposed SOI Areas A, B, and C would be pre-zoned in anticipation of future City growth.
- New Areas of Interest outside city limits and SOI (3,408 acres) as potential future growth areas to enhance coordination between the City and other responsible agencies.

The Project site contains Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and a portion of the Project site is subject to a Williamson Act contract and an Agricultural Easement.

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

- The project's compatibility with lands within an agricultural preserve and/or enrolled in a Williamson Act contract.

WILLIAMSON ACT

Where, as here, the project site is located on land subject to a Williamson Act contract, the Department advises that the environmental review discuss the compatibility of the project with the contract and local Williamson Act program requirements.

POTENTIAL IMPACT TO DEPARTMENT-FUNDED CONSERVATION EASEMENT

The area proposed for inclusion within SOI Area A and SOI Area B includes farmland protected in perpetuity through the California Farmland Conservancy Program.

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”]; see also *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project's surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

Thank you for giving us the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Harvest Master Plan, Southeast Annexation, and General Plan Amendment Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber

Monique Wilber

Conservation Program Support Supervisor