From: Growers/Vintners for Responsible Agriculture
Prepared by: Dr. Amber Manfree

October 1, 2021

Attn: David Morrison
Director
Planning, Building, & Environmental Services
Napa County
1195 Third Street, 2nd Floor
Napa, CA 94559

RE: Walt Ranch amended mitigation measures

Dear David Morrison,

This letter expresses opposition to the Walt Ranch Project amended mitigation measures advanced by Hall Brambletree & Associates on the following grounds:

> Core information is missing from the amended mitigation proposal, preventing review and verification of claims.
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> The proposal fails to demonstrate that land preserved would otherwise be developed.
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> Proposed planting is inadequate because the amended mitigation fails to properly identify planting areas, and fails to consider current ambient environmental conditions in seedling survival rates.
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> The project represents both a permanent loss of carbon sequestration and a net increase in GHG emissions that will continue into the indefinite future. Climate change impacts globally and locally over the past five years demonstrate the necessity of avoiding any additional GHG emissions.

1. Missing data
Current proposed Erosion Control Plan (ECP) boundaries for the project are not available via Napa County, and are not included in the proposed mitigation amendment document. The amended mitigation proposal claims that 316 acres will be cleared. This is a close match to the 315 acres delineated in a version of Napa County's ECP layer acquired September 21, 2020, however that layer includes 20 acres of proposed clearing *inside* boundaries of "Proposed Easement Area" parcels that the amended mitigation proposal says will be off-limits to development. Either ECP boundaries are out-of-date, or amended mitigation measures document fails to identify planned clearing inside of proposed easement areas.

Please note that updated ECP boundary data were requested via email in April and September 2021. County staff has informed me that there has been an unfortunate glitch at ArcGIS Online, so that ECP geospatial data are not available through the standard outlet at this time. In response, I offered to visit county offices in-person or accept paper/static digital versions of planning maps, but the request has not been accommodated.

Key questions not addressed in amended mitigation measures and that are unanswerable with available data:

- Are areas inside of "Proposed Easement Area" parcels slated to be cleared?
- Have areas proposed for clearing outside of the "Proposed Easement Area" parcels changed?
- If ECP boundaries have changed, what is/was the vegetation composition of areas to be cleared?
- If only "developable" land is counted toward mitigation, 60/40 requirements are not met in Milliken watershed
    - Available ECP boundaries indicate that 60% of trees (70 of 117 acres) on developable project land in Milliken watershed are proposed for clearing
    - 32% of total trees (70 of 221 acres) on project land in Milliken watershed are proposed for clearing
- What is/was the vegetation composition of areas to be set aside?
- What is the mitigation ratio for canopy lost vs. preserved under the amended mitigation measure (2:1, or less)?
- How does proposed mitigation areas compensate for that loss

2. Development risk

The initial mitigation proposal failed to specify where trees would be protected, and the appellate court ruling states that "…carbon sequestration from permanent conservation constitutes an offset only if the forest conserved was under a significant threat of conversion."

Amended mitigation measures do not demonstrate that land preserved would otherwise be developed. "Proposed Easement Area" parcels contain about 207 acres of woodland that could technically be developed under current rules (independent analysis), however, these parcels were not identified for substantial areas of development in the original EIR or the available ECP boundaries dataset. Due to rugged terrain, land available for development in these parcels is highly fragmented. Also, this area includes the remote north-central segment of the property.

Similarly, figure 2 in the amended mitigation measures identifies an additional 35.1 acres outside of the proposed easement area where trees will not be cleared. The 35.1 acres are mostly located outside of areas proposed for clearing in both the original EIR and available ECP boundaries dataset. This acreage includes dozens of forest fragments less than one half acre in size.

The applicant has identified the areas which are the least profitable from a development perspective and proposed them for mitigation. These areas are not "under a significant threat of conversion," as evidenced by previous versions of the same plan. They are, instead, the least desirable areas in the project extent for conversion.

3. Proposed planting inadequate

The proposal incorrectly assumes that planting 16,790 seedlings in overlapping burn areas area will (a) result in standard survival rates and (b) introduce trees to an open landscape.

On-site ambient environmental conditions have shifted significantly between the completion of the EIR in 2016 and the amended mitigation measure in 2021. In the interim, climate scientists have confirmed

that California is entering a megadrought, and can expect less precipitation that historical averages in the foreseeable future.

Relatedly, warmer temperatures and reduced precipitation are driving record-setting soil moisture deficits throughout western North America. Increasing evaporative demand is escalating summertime drought severity. Areas recently burned, and frequently burned, are especially dry, and may shift into alternative ecosystem states.

Most of the project site burned in both 2017 and 2020, and altered soil chemistry - especially in areas with high burn severity - may lower seedling survival rates. Seedling survival is estimated at 80% in the proposed mitigation amendment, however achieving stated success rates is unlikely due to environmental changes.

The amended mitigation measures identify the entire overlapping 2017 and 2020 fire area as "eligible planting areas." While some of this area is likely ready to receive seedlings, fire impacts are seldom monolithic. It is likely that many trees survived. Site heterogeneity should be accurately reflected in the planting proposal. The current plan is not sufficient to assure success.

4. Net increase in GHGs

Our atmosphere currently contains an average of over 500 ppm in CO_2 equivalents. This project has not been built yet, and the damage it will accrue can still be averted. The project has faced significant opposition from the public throughout the planning process. If Napa County administrators or representatives cannot bring themselves to do what is right for the climate, or to listen to constituents, they should at least require stringent mitigation measures for this project.

The worst-case scenario for global warming tracks closely with actual emissions and this trend is expected to continue unless drastic changes are made by decision-makers. Both cumulative GHG emissions and detrimental climate system feedbacks directly correlate to global increases in temperature and thus increase risk due to extreme weather events. With every increment of warming, regional shifts in mean temperature, precipitation, and soil moisture deficits increase.

In recent years, Napa County residents have become intimately familiar with the havoc wrought by overall increased temperatures, increased fire severity, drought, and storm intensity driven by climate change. It is undeniable that these impacts are a threat to human safety and our local economy. We have lost lives to fire. We have lost substantial portions of annual harvests. Exacerbating the conditions contributing to these losses in any way is unconscionable. The direction of the arc of our decisions should be bending toward rapid reductions in greenhouse gas emissions and aggressive carbon sequestration projects. We cannot afford to move farther down the road of climate and ecological collapse.

Approval of the Walt Ranch project, and/or the acceptance of the proposed revised GHG mitigation measures, would move us farther down that road, increasing risk for this community and for communities everywhere.

In conclusion, I urge the County to reject amended mitigation measures proposal because it is scientifically inadequate, fails to meet requirements set forth by the appellate court, and because the project as a whole exacerbates already unacceptable levels of risk in this community.

Respectfully,

Amber Manfree PhD

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