



Napa Group,  
PO Box 5531  
Napa, CA 94581

March 10, 2017

To: Planning Director David Morrison

From: Napa Group Sierra Club

RE: Comments on Napa County Draft Climate Action Plan

Director Morrison:

Thank you for requesting public comment on the Draft Climate Action Plan (CAP). We appreciate that past comments and suggestions were taken into account and used to improve the Measures of the plan.

Please consider our suggestions, questions and observations offered below.

1) Overall Comment

The CAP measures GHG emissions and reductions in terms of metric tons of CO<sub>2</sub> equivalents (MTCO<sub>2e</sub>/year) using a 100-year Global Warming Potential (GWP<sub>100</sub>) to calculate the value of emissions. Reducing CO<sub>2</sub> emissions is important for the long term, however both the State Air Resources Board (ARB) and the regional Bay Area Air Quality Management District (BAAQMD) are shifting the focus on reducing emissions of short-lived climate pollutants (SLCP's), the ARB designation, or "super GHG's", the BAAQMD designation, in order to achieve a meaningful near-term reduction in emissions. To that point, in the near future there will be state and regional goals for the reduction of these compounds: methane, black carbon, hydrofluorcarbons, and other high GWP gases. In addition, both ARB and BAAQMD use updated GWP values to evaluate these emissions and their reductions.

- Question: How can the CAP inventory be expanded to show super-GHG and black carbon emissions for each sector and each proposed reduction measure?
- Question: How can the CAP be automatically updated to come into compliance with new state and regional goals in a 6-month timeframe (rather than the current 5 years)?

2) Comments on specific measures

- Measure BE-10: Provide metrics showing the reduction in emissions if wood waste is used to generate electricity in a biomass gasification plant

vs. being disposed of through shipping out of county or through landfill burial. (This may also be included in Measure SW-2)

- Measure TR-1: Include language that says “The Transportation System Management Ordinance will establish a measurable target in terms of Vehicle Miles Travelled (VMT).”
- Measure AG-1: Show assumptions and data for this. They are missing from Appendix B, Reduction Measure Quantification. We support the County’s participation in the development of a wood waste to energy plant.
- Measures WA-3 and WA-4: Include language that incentivizes installation of low-emission winery wastewater treatment methods and use of recycled water in winery operations.
- Measure LU-1:

We would like some clarification regarding this measure, which reads:

“Establish targets and enhanced programs for oak woodland and coniferous forest preservation and mandatory replanting”.

The discussion of LU-1 states “Trees that cannot be preserved will be required to be replaced at a 2:1 ratio, consistent with GP policy CON-24..... Considering County resources, staffing and physical space limitations on available lands, it is assumed that an average of 2,500 replacement trees will be planted per year beginning in 2017. This target could be achieved by a combination of existing or enhanced volunteer replanting efforts (e.g. 5000 Oaks Initiative) and compliance with the County’s 2:1 tree replacement policy”.

- LU-1 states that replanting is “mandatory”, and the discussion refers to a requirement for a 2:1 ratio. However, the discussion seems to project a ceiling of 2,500 trees annually to be replanted, and that the number actually replanted depends on County resources, staffing and physical space limitations. This seems to be a contradiction.

Question: Is 2:1 replanting mandatory, or is it mandatory only up to the limit of County resources? That is to say, is the County’s program of planting 2,500 trees in addition to the requirement for 2:1 replanting, or does the 2,500 trees relieve project developers of any further replanting requirement?

Question: Given that the amount of County resources dedicated to replanting can fluctuate based on policy and on budgetary limitations, is the annual goal of 2,500 trees guaranteed, or could the actual number replanted be only 250, or 25 or zero, depending on the available County resources?

The 2008 General Plan Update EIR predicted 12,500 acres of new vineyards between 2005 and 2030, with a loss of between 2,682 and 3,065 acres of woodlands.

If we accept the lower number (2682 acres) of woodland, and divide it by the 25 year span of 2005 – 2030, it averages out to a loss of 107 acres of woodland annually. In the 13 years remaining until 2030, that would be a total of 1395 acres.

Ron Cowan, an expert on Napa oak woodlands, cites the Forest Service, Forest Inventory Data Online (FIDO) 2011-2015 dataset which estimates Napa County oak woodlands stocking to be  $\pm 70$  trees per acre for  $\geq 3$  inches dbh, which is the tree size standard established by the state's Climate Action Reserve Forest Project Protocol to measure countable tree carbon stocks. (The Walt Ranch project averaged 107 trees per acre of woodland, at  $\geq 5$ " dbh.)

Based on these numbers, average annual tree loss due to land use change is projected to be 7,490, and mitigation by replanting at a 2:1 ratio would require an average of 14,980 trees be planted annually.

Therefore, if the intent of LU-1 is to limit required replanting to 2500 trees annually, and if the above projections of tree loss are accepted, then LU-1 is woefully inadequate, because at best the annual County replanting upper limit of 2500 trees will mitigate for only 17.9 acres of woodland destruction, which is less than 17% of the projected annual woodland lost.

If all replanting efforts are the County's responsibility, we would question why the cost for the mitigation should be assumed by County taxpayers and volunteers.

Recommendations for LU-1:

Clarify the language to remove the uncertainty about whether the County's planting program constitutes the sole replanting mandate for projects which remove trees.

- LU-1 prioritizes preservation of existing trees on converted lands. We suggest that the preservation target of 30% be increased to at

least 50%. The preservation of healthy forest ecosystems (not simply individual trees) is important to capturing GHG emissions and carbon sequestration.

- Include language that requires accounting for direct and indirect changes in GHG emissions and carbon sequestration due to the project
- The implementation of the replacement rate of 2:1 is not specified. Planting and replacement measures should be spelled out in terms of survival rates (i.e., 80% of plantings must be well-established, meaning healthy and growing, after 5 years).
- Measure LU-3: We support this measure and would like to see wood waste from land conversions used to fuel a local biomass gasification power plant rather than buried.
- Impacts of LU-1 through LU-3:
  - County General Plan Policy CON-65 states that the County “strives to maintain current levels of CO2 Sequestration”. AB 32 includes a goal to maintain the current amount of carbon sequestration in forests in California. The Sierra Club agrees that a goal of no net decrease in carbon sequestration capacity is appropriate for Napa County.

Question: Given the projected loss of woodland carbon sequestration of 2800 acres or more, what is the projected saving in woodland carbon sequestration between 2017 and 2030 if this CAP is adopted with the current Land Use mitigation measures, vs. if no CAP or other new measures are adopted? In other words, can you quantify by how much the measures in this CAP will move Napa County closer to the goal of no net loss of carbon sequestration?

- The Sierra Club, as well as other organizations, has commented on several projects over the years regarding the lack of mitigation for GHG effects. In almost every case the County has responded that the individual project was too small to have a significant impact on the County’s GHG balance. (See attached letter from the County responding to our comments on the Galatea vineyard conversion –Dgalatea Vineyard EIR).

Question: What threshold will be applied to determine if projects which destroy trees are subjected to the mandatory GHG mitigation measures for carbon sequestration loss?

### 3) Requests for additional measures

- Update accounting of F-gas use in industrial settings such as wineries, warehouses and resorts. Then develop a measure to incentivize use of low-GWP refrigerants. The current CAP inventory is based on population and does not take into account the heavy use of refrigeration by our main industries.
- Develop a Land Use measure that incentivizes carbon farming plans, such as those being developed by the Napa County Resource Conservation District, to increase carbon sequestration on agricultural lands.

### 4) Climate Accounting

As we have previously recommended to the County Planning Department, the climate accounting methods currently in use are woefully out of date. For instance, methane is undervalued by 4- to 5- times, and the contribution to regional tropospheric ozone, a short-lived climate pollutant, is left out altogether. While the County is understandably tied to the accounting methods currently in use by the State, it would be beneficial for the County to simultaneously reassess its footprint using up-to-date climate accounting protocols based on Radiative Force Management, derived from the IPCC Fifth Assessment framework.

The benefits to the County of applying the updated climate accounting protocols would be as follows: 1) a much better understanding of our true climate footprint, and the chief sources contributing to this footprint; 2) a clearer understanding of the type and scale of response needed to offset this footprint, with a focus on the mitigation actions most beneficial in the near-term; and 3) an opportunity to set an example for the State of California and other counties struggling to understand how to address the issue of short-lived climate pollutants.

### 5) Feasibility of proposed measures

At the public meeting on February 23, several commenters questioned the feasibility of some of the CAP measures. In particular, Measure BE-6 (water heaters) and the AG Measures were called into question regarding their ability to be implemented and thus, their ability to provide the estimated GHG reductions. Measure BE-6 and Measure AG-3 are two of the top five measures providing the most reductions. If indeed these aren't feasible, our plan will need a major overhaul.

### 6) CAP Consistency Checklist

- What threshold of increase in GHG emissions are required for a project's emissions require mitigation?

- Will the Bay Area Air Quality Management District's Threshold of Significance continue to be used for projects in Napa County? This allows an annual increase of 1100 mTCO<sub>2</sub> eq.
- When will the CAP Consistency Checklist be available for review?
- Will there be a comment period for the CAP Consistency Checklist?

We look forward to seeing the responses to comments. Please let us know when those will be available.

Respectfully,  
Chris Benz  
Chair, Napa Group Sierra Club