



napa valley vintners

June 18, 2013

Terry Scott  
Chairman, Napa County Planning Commission  
County Administration Building  
1195 Third Street, Suite 210  
Napa, CA 94559

Dear Chairman Scott:

The Napa Valley Vintners (NVV), the nonprofit trade association representing more than 450 Napa Valley wineries, is a proud partner in the continued stewardship and protection of the Napa Valley's natural resources.

As members of the industry stakeholder group that has helped developed the "Best Management Practices Checklist for Development Projects" (BMP's) in its current form, we are pleased that all Napa County discretionary permit project applicants will be prompted to consider and adopt some of the practices listed.

It is also important that applicants receive credit for the BMP's they voluntarily implement prior to a permit application. It is essential that the good work of any applicant, whether they are a winery or not, is recognized during the greenhouse gas (GHG) analysis and project review process.

Our board of directors recently reviewed and voted to support the BMP checklist with the following provisions to strengthen it:

**1. All Efforts Should Be Recognized**

During the stakeholder meetings, it was discussed that the BMP checklist would give the applicant an area to list existing and alternative measures that were implemented prior to the project. We would ask that this section be returned to the checklist.

**2. Appropriate Recognition of Napa Green**

As the Wine Industry's most comprehensive Best Management Practices program which has been specifically tailored to Napa County and developed in partnership with Napa County, participation in both Napa Green Land and Napa Green Winery should be given more emphasis in the BMP Checklist for Development Projects. Encouraging participation in the program should be a priority for Napa County planners while working on winery and vineyard applications. Participation in the program creates a strong GHG reducing foundation for any applicant, and

through the benefits of the Napa Green program, applicants will be encouraged to expand their “green” efforts in all aspects of their project. Napa Green should not be presented as insignificant in any way, but as the best place to start for any winery, vineyard or development project in meeting GHG reduction goals.

Cornerstone measures of the Napa Green program, including waste diversion, lowered water use, and energy conservation should be fully modeled during a project’s analysis. Further, when project applicants who are certified Napa Green apply for use modifications or expansions, their existing participation in the Napa Green program(s) should be applied to their GHG emissions analysis. Those BMP’s, which are voluntarily implemented prior to a permit application, should not be included in “Business As Usual” (BAU) calculations. When they are considered BAU, applicants are, effectively, being penalized for their proactive efforts.

**3. Measureable vs. Immeasurable**

We understand the reasoning behind separating the measures and organizing them in a fashion that lists those measures which have the most significant GHG reduction potential first. However many of the measures listed as “immeasurable” are not in fact immeasurable, but rather have yet to be measured. We feel that many of these measures could be significant and it is important to understand their GHG reduction potential. The NVV welcomes the opportunity to work with county staff in whatever way possible to quantify the GHG reduction potential for each of these measures. We would also ask that the checklist be revised to say “Practices with Un-Measured GHG Reduction Potential” instead.

**4. Solar Use**

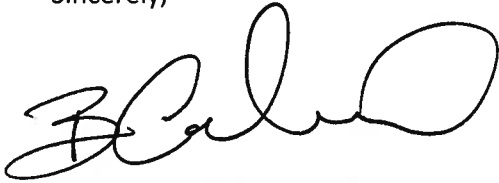
Projects that install or use solar panels should receive credit for those GHG reductions regardless of use contracts or carbon credit structures. For example, if a winery in Napa Valley has solar, but has signed a contract saying that the company who installed the solar panels receives the associated GHG reduction credit, credit on the Napa County BMP checklist should still be given.

**5. Ability to Receive Credit Within a Parent Company**

For those affected businesses that own multiple properties within Napa County, we would recommend that offset efforts undertaken at one property, and their resulting GHG reductions (where they are exceeding their required reductions), be applicable to another existing property owned by the same business.

A lot of hard work has gone into the development of this checklist and we would like to sincerely thank county staff for its development and the opportunity to offer input throughout the process. We hope the suggestions listed above can be incorporated and that work on the Climate Action Plan will begin in earnest shortly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Cakebread', with a large, stylized loop at the end.

Bruce Cakebread

President

Napa Valley Vintners Board of Directors

Cc: Napa County Planning Commissioners  
Napa County Board of Supervisors  
Hillary Gitelman, Napa County Planning Director