



Planning Commission Mtg.

JUL 05 2017

Agenda Item # 8B

July 4, 2017

Planning Commission
County of Napa
1195 Third Street
Napa, CA 94559

RE: Agenda Item #8B: Final Draft Climate Action Plan

Dear Commissioners:

I know there is a lot of technical data and pages of text. My time this morning is focused on CAP Table 16 GHG Inventory. I have attached a copy to my letter as well as another chart entitled Table 16 Comparison.

The comparison chart outlines the Carbon Stocks and Annual Sequestration Rates for various land covers and includes the values from last year's draft (Feb 2016), the current CAP, and the values provided by the Quercus Group (forest & greenhouse gas consultants).

What is not clear, nor explained is reasoning behind the changes from the Feb 2016 estimates. Carbon stock values are mostly lower than 2016 analysis while the Annual sequestration rates are consistently higher. And all are vastly different from Quercus Group's values.

Some of the reasoning might be that CAP's reference sources are largely outdated. For example, USDA 2005 or IPCC 2006 standards do not take into account specific requirements of the California Green House Gas law. Methane & black carbon emission regulations being prime examples. Forest Service CUF 2009 is an urban tree model inappropriate for analyzing Napa County's timberland and oak woodlands.

So, I question the overall validity of the values and resulting conclusions presented in this Draft Climate Action Plan before you today. The use of scientifically outdated information under CEQA may have legal ramifications. I concur with Nancy Tamarisk of the Sierra Club and ask that the current version be returned to the Planning Department for revision to reflect current science and policy.

Thanks and regards,

Eve Kahn

Eve Kahn, Chair
Get a Grip on Growth
PO Box 805
Napa, CA 94559

Attachments: Table 16 from CAP Appendix and Table 16 Comparison Chart

Table 16 2014 Unincorporated Napa County GHG Inventory: Lost Carbon Stock and Sequestration Factors by Land Use Type¹

Land Use Type	Stored Carbon		Annual Sequestration	
	Carbon stored per acre (MT C/acre)	Method or Sources	Annual Net Carbon Sequestration per acre (MT C/acre/yr)	Method or Sources
Oak Woodlands	34.9	Calculated from carbon fractions and biomass ratios from IPCC 2006a and per-acre aboveground biomass factors and tree densities from USDA 2005. Tree densities represent 12 northern California counties, including Napa County. Calculated factor represents above and below ground live biomass only. Represents average of eight oak species.	2.017	Calculated from annual growth rates derived from Table 13 in USDA 2005 calculated carbon storage values per tree from IPCC 2006a and USDA 2005, and tree densities from USDA 2005. Represents average of eight oak species.
Coniferous Forest	47.0	Calculated from carbon fractions and biomass ratios from IPCC 2006a, per-tree aboveground biomass factors from CUFR 2009, and tree densities from USDA 2005. Tree densities represent 12 northern California counties, including Napa County. Calculated factor represents above and below ground live biomass only.	3.129	Softwood factors calculated from ratio of growth and mortality rates between California softwoods and hardwoods from Table 3 in Liang et. al. 2005 and adjusted against hardwood growth rates in USDA 2005.
Riparian Woodlands	57.0	Calculated based on average of eight oak species, tanoaks, and redwoods using same sources as above IPCC 2006a, USDA 2005, and CUFR 2009, as directed by the County. Calculated factor represents above and below ground live biomass only.	4.744	Average of 8 oak species, tanoaks, and redwoods, a softwood, using same methods as above depending on wood type.
Grasslands	2.6	Factor calculated from total area and total carbon stocks for grassland from Table 5 in Battles, et. al. 2014.	0	Factor available directly from page 19 of Brown, et. al. 2004.
Shrublands	12.8	Factor calculated based on page 18 in Battles, et. al. 2014 that states that on average, the carbon density of grassland is only 20% of shrublands.	0	Factor available directly from page 19 of Brown, et. al. 2004.
Croplands (Not Vineyards)	2.2	Includes the County mix of olives, vegetables, and hay as reported in the County's 2014 Crop Report. Carbon storage factors from Battles, et. al. 2014 and Brown, et. al. 2004 scaled by acreage for each crop type.	0.081	Weighted average of olives, vegetables, and hay sequestration rates based on acreages in Proietti et. al. 2014 and the 2014 Crop Report. Assumes vegetables and hay have zero annual sequestration.
Vineyards	1.2	Factor converted directly from Table 2.6 in Brown, et. al. 2004.	0.016	Factor converted directly from page 1980 of Kroodsma, et. al. 2006. Includes sequestration in woody mass, pruning, removal of vineyards after a 25-year lifetime, burial in soil, and an average level of conversion to biomass energy.

Note: MT = metric tons; C = carbon; GHG = greenhouse gas. See Attachment A for detailed calculations of the carbon storage and sequestration factors.

¹ Changes in land use patterns do not immediately change soil carbon levels. Instead, changes to soil carbon may be gradual, while change in land use patterns would have immediate impacts on aboveground and some belowground biomass. As such, soil carbon is not included in this analysis.

Source: IPCC 2006a, USDA 2005, CUFR 2009, Battles, et. al. 2014, Brown, et. al. 2004, Liang et. al. 2005, Proietti et. al. 2014, Napa County 2015, Kroodsma, et. al. 2006, Hade, pers. comm., 2015; data compiled by Ascent Environmental, 2016.



TABLE 16 COMPARISON

land cover	Carbon stocks (MT C/ac)			Annual sequestration rates (MT C/ac)		
	Former estimate Feb 2016	CAP	Quercus Group	Former estimate Feb 2016	CAP	Quercus Group
oak forest	29.5	34.9	75	0.42	2.017	0.6
coniferous forest	78.2	47	110	0.7	3.129	1.0
riparian forest	77	57	180	0.74	4.744	2.2
grasslands	2.6	2.6	70	0	0	0-.15
shrublands	12.8	12.8	35	0	0	0.7
woody wetland marsh	none	none	111.5	none	none	0.1



HARMS VINEYARDS & LAVENDER FIELDS

July 5, 2017

Planning Commissioners
1195 Third Street, Suite 210
Napa, California 94559

Planning Commission Mtg.

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Agenda Item # 8B

Re: Comments on Napa County's Final Draft Climate Action Plan

Dear Planning Commissioners,

My husband and I grow grapes on Dry Creek Road. I am writing about a particular measure in the draft plan, **Measure AG-1**. In the Draft Plan, this measure reads:

"Support BAAQMD (Bay Area Air Quality Management District) in ending open burning of removed agricultural biomass and flood debris." **It was considered mandatory and was quantified.**

The Grapegrowers and Farm Bureau commented that this is not possible, so the Final Draft now reads:

"Support BAAQMD in efforts to reduce open burning of removed agricultural biomass and flood debris." **But now this reduction of open burning is voluntary and qualitative.**

In addition, the text explaining the measure says "There may be instances where open burning is still the most effective tool to prevent the spread of pests and disease, and for this reason the County will support ongoing use of open burning where appropriate and in compliance with BAAQMD regulations."

Given that open burning is a source of one of the most destructive greenhouse gas emissions, black carbon, and that the Grapegrowers are promoting an effective low-smoke burn method, I request that the CAP read:"the County supports the use of the low-smoke method endorsed by the Napa Valley Grapegrowers where appropriate..." rather than supporting traditional "open burning" with its large amount of smoke.

There is another alternative as well, that of recommending the cultivation of fine, old growth vintages. Young vines produce more but not better fruit than well-farmed old vines. Old growth vines also use less water as they have deeper, established roots. Farming with the climate and conditions on the ground is becoming more important than farming purely for economic benefit.

Sincerely,

Patricia Damery
Harms Vineyards and Lavender Fields



Attention: Jason R. Hade, AICP, Planner III
Napa County Planning, Building & Environmental Services Department
1195 Third Street, Suite 210, Napa, California
(707) 259-8757
jason.hade@countyofnapa.org

Dear Mr. Hade,

On behalf of 700 grower and vineyard manager members, the Napa Valley Grapegrowers appreciates the County of Napa's thoughtful response to comments submitted on March 10, 2017 regarding the proposed Climate Action Plan (CAP) and continued willingness to address questions, explain the program, and solicit feedback. NVG's mission 'to preserve and promote Napa Valley's world-class vineyards' makes us a committed partner in protecting Napa Valley's environmental assets. As noted in our March 10 letter, we understand the importance of developing a CAP that is both feasible and effective at preserving our local environment, to the benefit of the community at large as well as to the agricultural industry. Additional comments are provided with the same aims:

- To aid the County in understanding how proposed measures translate "in the field"
- To promote the implementation of a robust, science-based CAP that recognizes successful policies and best practices programs
- To ensure that proposed measures do not unintentionally increase the risk of crop losses
- To ensure that measures do not encourage growth inducing impacts leading to the loss of farmland
- To track the goals of the CAP against the landscape of current County regulations

NVG continues to support the County's goals to reduce agriculture-related emissions and adhere to standards regulated at the State level. However, after analyzing the revisions and responses to comments, we believe that considerably more clarification and consideration is needed prior to adopting the proposed CAP. **As such, NVG would like to request an extension to properly assess and work with the County to address significant concerns. In particular, we believe more time is needed to understand newly introduced language including the Appendix D CAP Consistency Checklist and the definition of "voluntary" prior to the Board of Supervisors review, tentatively scheduled for August.**

Please note, while the County released the revised CAP on June 7, the redlined version of the 268-page document was only made available to the public on June 21, which has provided key stakeholders with less than two weeks to adequately review revisions prior to the July 5 Planning

Napa Valley Grapegrowers 1

Commission Meeting. This tight timeline is compounded by the federal holiday in between now and then. While NVG is submitting comments on July 3, we are concerned that this may not have supplied sufficient lead time for Planning Commissioners to review the input and would have appreciated additional time with the redlined version.

NVG supports the County’s re-labeling of Measures AG-1 through AG-4 to voluntary, however, Appendix D appears to go against this notion, raising significant concerns and creating confusion. Appendix D states that “This checklist only applies to certain development projects that require discretionary review and must undergo environmental review (i.e. not exempt) pursuant to CEQA.” As such, NVG requests that the County provide a specific list of what instances may trigger discretionary review. It further states that “only building permits” will be exempt from the checklist. For this reason, NVG believes that the checklist renders the indication of “voluntary” in Table 5.1 as misleading, since nearly all development scenarios are pursuant to CEQA. To emphasize the point that compliance appears to be mandatory for all new developments, Appendix D states the following:

“Implementation of the CAP will require that new development projects attain higher levels of efficiency and incorporate more sustainable design standards. To help new development applicants plan and design projects consistent with the CAP, and to assist county staff in determining the consistency of proposed projects with the CAP during the development review, the County has prepared the CAP Consistency Checklist (Checklist).”

Thus, at the very least, the Checklist appears to imply that all new vineyard developments, being subject to discretionary review, are therefore mandated to comply with the proposed regulations, regardless of the “voluntary” label in Table 5.1. We are even more deeply concerned that existing properties may somehow trigger the kind of discretionary review that would require compliance with the checklist.

In addition to the concerns raised above, the following summary table highlights responses to revisions and responses.

SECTION	REVISED/CURRENT LANGUAGE	ADDITIONAL COMMENTS	MARCH 10 LANGUAGE	MARCH 10 COMMENTS	MARCH 10 SUGGESTIONS
<i>Measure AG-1</i>	Support BAAQMD in efforts to reduce open burning of removed agricultural biomass and flood debris	- NVG appreciates the revised language and the County’s acknowledgement of the need to promote the use of burning for mitigating the spread of detrimental pests and diseases. NVG is committed to promoting our Low-Smoke Agricultural	Support BAAQMD in ending open burning of removed agricultural biomass and flood debris	- The county should not end open burning of agricultural crops for disease removal until providing a viable industrywide alternative to the agricultural community. As written, AG-1 does not account for	- Promote the use of <i>NVG’s Best Practices for Low Smoke Agricultural Burning</i> (CLICK HERE AND ATTACHED), which offers a 6-step approach to burning virtually smoke free.

		<p>Burning Technique for this purpose.</p>		<p>cases in which vines are burned to prevent the risk of spreading pests, diseases, and pathogens that could have detrimental effects on Napa Valley vineyards. There is no suitable alternative method for this kind of disposal.</p> <p>- There is insufficient evidence to suggest that 236 MTCO₂e/year will be reduced as a result of proposed alternative methods. Currently, the most cost effective, potential alternative to burning diseased vines would be to haul plant material to a landfill. Excessive organic matter buried under anaerobic conditions such as a landfill produces methane and other detrimental GHGs and competes for extremely valuable landfill space.</p> <p>- Burning also allows growers to effectively segregate recyclable trellis</p>	<p>- NVG encourages the County to conduct a comparative carbon analysis of burning and proposed alternative methods that accounts for the long and short term of CO₂ impact, in order to identify the most sustainable approach prior to adoption.</p>
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				material from diseased grapevines, while other proposed methods make the recycling process more difficult and extremely expensive. For all proposed alternatives, the County should consider the effect of emissions resulting from hauling, machinery, and natural decomposition.	
<i>Measure AG-2</i>	Support the conversion of all stationary diesel or gas-powered irrigation pumps to electric pumps	<ul style="list-style-type: none"> - The County did not adequately address NVG's original concerns regarding growth inducement, costs, and inconsistencies with the rural nature of the County as stated in the March 10 letter (language to the right). - Although this measure is listed as voluntary in Table 5.1, Appendix D appears to make this eventually mandatory for all or nearly all projects. 	Convert all stationary diesel, or gas powered irrigation pumps to electric pumps	<ul style="list-style-type: none"> - This measure needs clarification. Does "gas powered" mean propane? Is biodiesel included in this? - NVG views the conversion of infrequently used, stationary pumps to full-time, on-demand electric power as a growth inducing impact. To what extent will the County do additional environmental impact studies prior to adoption? - Many vineyards have no other need for being serviced by PG&E. In most cases, use of this service will be infrequent, while 	<ul style="list-style-type: none"> - This needs to be voluntary with a grant program put in place, similar to the Carl Moyer program that pays for replacement of old tractors with tractors that meet the EPA's Tier 4 requirements. - Provide clarification prior to adoption on the true financial and environmental costs of compliance, factoring in the lack of infrastructure at a significant number of vineyard operations. - Evaluate the true CO2 savings of this potentially growth inducing impact, if any.

				<p>still incurring extremely high standby costs. This measure seems growth inducing and a poor use of resources.</p> <ul style="list-style-type: none"> - Current wait times for new PG&E service delivery can be a year or more. - To implement would require costly infrastructure and easements on properties, which may require tree removal for access. - The appearance of above ground power lines is inconstant with the rural beauty of our County. 	
<p><i>Measure AG-3 Measure</i></p>	<p>Support use of electric or alternatively-fueled agricultural equipment</p>	<ul style="list-style-type: none"> - The County did not adequately clarify concerns raised in NVG's March 10 letter (language to the right). - Although this measure is listed as voluntary in Table 5.1, Appendix D appears to make this eventually mandatory for all or nearly all projects. 	<p>Support use of electric or alternatively-fueled agricultural equipment</p>	<ul style="list-style-type: none"> - This measure needs more clarification. - Does biodiesel qualify as an alternative fuel? - What types of agricultural equipment does this refer to specifically? - Has a comprehensive cost analysis been done? 	<ul style="list-style-type: none"> - This needs to be voluntary with a grant program put in place, similar to the Carl Moyer program that pays for replacement of old tractors with tractors that meet the EPA's Tier 4 requirements. - Provide clarification prior to implementing on the true financial and

		<ul style="list-style-type: none"> - There are currently no electric vineyard tractors in existence that remotely farm to the standard required to farm modern vineyards today, therefore “vineyard tractors” should be removed from the list of examples on page 3-21. 		<ul style="list-style-type: none"> - Many vineyards have no other need for being serviced by PG&E. In most cases, use of this service will be infrequent, while still incurring extremely high standby costs. This measure seems growth inducing and a poor use of resources. - This measure may heighten risk related to protecting crops during a seasonal frost event. 	<p>environmental costs of compliance, factoring in the lack of infrastructure at a significant number of vineyard operations.</p> <ul style="list-style-type: none"> - Ensure that measures do not unintentionally create high-risk scenarios that could lead to crop losses.
Measure AG-5	Support reduced application of inorganic nitrogen fertilizer	<ul style="list-style-type: none"> - Grapes already use relatively low amounts of nitrogen fertilizer, as excess nitrogen can be detrimental to wine quality. Therefore, if implementing this measure, NVG would like to confirm that starting from an already low baseline would not detract from the ability to comply. - NVG would like to see more scientific analysis on the benefits of organic over inorganic nitrogen fertilizers as they relate to targeted GHG reductions. 	NA	NA	NA

		- NVG requests that the County analyze this measure further prior to implementation. Can the County provide more information on how this measure would work, how data would be collected and reported, and whether the County has the capability to generate more compost locally?			
<i>Measure AG-6</i>	Encourage and support the use of carbon farming and other sustainable agricultural practices in the County	- NVG would like the County to elaborate on what is meant by carbon farming, however NVG is generally very supportive of all best practices based programs.	NA	NA	NA
<i>Measure LU-1</i>	Establish targets and enhanced programs for oak woodland and coniferous forest preservation and mandatory replanting	- The County did not address all of NVG's original questions including whether changing voluntary BMP programs to County Code will trigger a costly EIR process.	Establish targets and enhanced programs for oak woodland and coniferous forest preservation and mandatory replanting	- There should be clarification on the type of modifications that will be made to County Code, particularly since Measures LU-1 and LU-2 appear to be in alignment with current General Plan policies, EIR processes, Conservation Regulations and other County policies.	- Take account of existing policies and voluntary BMPs as a pathway for future reductions of GHGs, as more vineyards become subject to requirements. - The County should continue successful efforts of encouraging and promoting conservation easements on working

				<ul style="list-style-type: none"> - If County Code changes voluntary BMP programs to mandatory, this action would require the County to undergo a costly EIR process. 	<p>agricultural lands and other open space properties that help to achieve the outcomes desired by LU-1.</p> <ul style="list-style-type: none"> - Ensure that any change made to County Code clarifies rather than creates duplication and complexity.
Measure LU-2	Refine protection guidelines for existing riparian lands	<ul style="list-style-type: none"> - NVG would like the County to confirm that changes to current protection guidelines will in no way inhibit ongoing restoration work, such as the <i>Napa River Rutherford Reach Restoration Project</i>, or conflict with other entities, as listed to the right. 	Refine protection guidelines for existing riparian lands	<ul style="list-style-type: none"> - Clarification is needed to ensure that this measure will not hinder ongoing restoration work, such as the <i>Napa River Rutherford Reach Restoration Project</i>, and similar projects. - Confirmation is needed that measures will not conflict with other entities such as the Army Corp of Engineers and the Department of Fish and Game. 	<ul style="list-style-type: none"> - Take account of existing policies and voluntary BMPs as a pathway for future reductions of GHGs, as more vineyards become subject to requirements. - Clarify that changes in County policy will not prevent the removal of non-native disease hosts along riparian corridors. - Ensure that any change made to County Code clarifies rather than creates duplication and complexity.
Measure MS-2	Support efforts to increase Napa Green Certified wineries	<ul style="list-style-type: none"> - NVG applauds countywide sustainability goals, and simply recommends that language reflect the 			

	and vineyards in the unincorporated County, with a goal of 100 percent certified by 2030	<p>multitude of programs currently available to landowners, as well as new potential programs. For example, language could be changed to say, "Support efforts to increase the number of sustainably certified wineries and vineyards in the unincorporated County, with a goal of 100 percent by 2030, via programs such as Napa Green, or of equivalent/similar standards."</p> <p>- A list of current programs includes but may not be limited to Napa Green, California Sustainable Winegrowing Program, Fish Friendly Farming (also a pathway to Napa Green), Land Smart (also a pathway to Napa Green).</p>			
1.3.2 <i>Napa County</i>	Over the last decade, the County has taken several steps to begin addressing climate change, sustainability, and reductions in GHG	- NVG continues to urge the County to quantify a target number associated with the benefits that will be incurred as a result of the existing Track II ECP process. Significant acreage planted before 1991 is currently in	Over the last decade, the County has taken several steps to begin addressing climate change, sustainability, and reductions in GHG	- It is good for the County to highlight steps already taken that address climate change, and the Ag Preserve should be included in this section as having been instrumental in preventing the	- Acknowledge the benefits that have been achieved by the County's commitment to agriculture, specifically through the creation of the Agricultural Preserve.

	emissions...notable County efforts are highlighted below	replant stages, and of these, vineyards that exist on slopes greater than 5% planted prior to 1991 will begin retaining permanent or every other row cover crops where previously not required. We feel this carbon inventory and reduction in CO2 emissions is significant and may achieve many of the reduction targets the CAP seeks. The County should recognize and take credit for this foresight in setting up a mechanism with continued returns as was done with the implementation of ECPs.	emissions...notable County efforts are highlighted below.	urbanization that has taken place in other Bay Area jurisdictions.	<ul style="list-style-type: none"> - Model after other counties' CAPs (i.e. Yolo and San Joaquin Valley) that recognize best practice standards and the valuable contributions made by working farmland and other open space. - Include measures to create funding and incentives to assist farmers in implementation of goals.
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We continue to urge the County to assess the costliness of implementation for landowners, and in particular, the impact this will have on smaller farming operations. For example, AG-2 and AG-3 will force landowners mid-cycle to make costly, un-forecasted changes to vineyard infrastructure and agricultural equipment regardless of long-term farm plans. In addition, the County did not address concerns over lack of access to PG&E services on many vineyards, rendering the proposed measure unduly difficult to comply with. We ask again that the County provide a comprehensive cost analysis that elaborates on the cost/benefit ratio of proposed mitigations. The CAP is not the only proposed legislation in the pipeline for landowners, and it is important for the County to consider the cumulative impacts of forthcoming regulations on local farming operations. Other significant regulations in the pipeline include the SF Bay Regional Board's General Waste Discharge Requirements (WDR), as well as various new state and federal labor laws, including the new California Overtime Bill. We have estimated an increase of up to 20-30% in labor costs within the next 5 years. This kind of increase could be detrimental to family-run operations and even larger entities.

Finally, as was mentioned in the previous letter, NVG hopes that when considering the path forward, the County recognizes the environmental benefits that have been achieved through its commitment to agriculture, specifically through the creation of the Agricultural Preserve. Our landmark zoning sets Napa County apart from other counties in California, as having been instrumental in preventing the urbanization that has taken place since 1990. According to the Bay Area Air Quality Management District,

“Over the past 50 years, a large amount of agricultural land has been converted to urban/suburban uses in the Bay Area, with losses of over one-third of farmland. Agricultural lands are currently under threat from development in the Bay Area. In addition to the loss of habitat, carbon sequestration, and other ecological benefits of agriculture, conversion of farmland to urban/suburban uses also results in higher emissions of GHGs, as urban/suburban land use is associated with greater emissions of GHGs and other air pollutants.”¹

Furthermore, analyses have found that an acre of agricultural land on average produces 58 times fewer GHG emissions than an acre of urban use.² Therefore, when proceeding in the development of the CAP, NVG urges the County to be mindful of recognizing the environmental accomplishments of the Ag Preserve and to craft measures that prevent, rather than promote, the conversion of agricultural land.

Thank you again for this additional opportunity to comment.

Sincerely,



Garrett Buckland
President, Napa Valley Grapegrowers

cc: Director David Morrison, Napa County Department of PBES

¹ http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/agriculture_sector-pdf.pdf?la=en

² <http://www.farmlandinfo.org/sites/default/files/AFTCrop-UrbanGreenhouseGasReport-February2015%20Edited%20May2015.pdf>

JUL 05 2017

Agenda Item # 8B

Napa CAP Comments For Hearing

My comments are directed to master response 6 in the FEIR regarding the claim that GHG emissions included in the inventory resulted in underestimation of transportation emissions from vehicle miles traveled generated by activities in Napa County. The response cites the ICLEI protocols used in the preparation of the inventory. Use of the ICLEI protocols are not mandated by any regulation nor are they a guarantee of satisfying the informational requirements of CEQA. ICLEI protocols are advisory and give communities a range of choice regarding the scope of emissions to include in their GHG inventory in a CAP. The Response justifies the County's choice as "a framework consistent with the Protocol that accounts for emissions sources over which the County would have significant influence." The County then restricts that framework to "community-wide activities that generate emissions within the boundaries of the unincorporated County, and in the case of transportation, on-road vehicle trip origins and destinations may be located within the County or the broader region, i.e. San Francisco Bay Area).

This application of the protocol to Napa County, with millions of yearly tourists from around the world and billions of dollars in export revenue from the global distribution of Napa wines, results in the omission of a large range of emissions, beyond County and regional boundaries, resulting from activities in Napa County over which the County has significant influence. The vineyards, wineries, hotels, event centers, located in the Unincorporated County, that generate these emissions, are facilities which would not exist but for permits issued by the County. The foreseeable and intended consequence of issuing permits for tourist destinations is to attract global tourist traffic. The foreseeable and intended consequence of issuing permits for wine production is to export to a global market. If other jurisdictions use a similar origin-destination protocol with a similar restricted scope of GHG emissions from VMT, excluding emissions from on road, air and sea travel beyond regional borders, millions of metric tons of GHG emissions will go unaccounted, not attributed to any jurisdiction.

The exclusion of any accounting for these millions of metric tons of emissions generated by activities explicitly permitted by the County constitutes the omission of a large range of information necessary for informed discussion, as held by case law governing the level of information required in an EIR for compliance with CEQA.

Jerry Bernhaut, esq.

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Santa Rosa, CA 95409

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Barrella, Donald

From: lauren coodley <lcoodley@hotmail.com>
Sent: Monday, July 03, 2017 1:38 PM
To: Barrella, Donald
Subject: hey Don; can you forward to relevant parties? thank you!



How climate change could threaten the water supply for millions of Californians

Climate change will raise salinity in the Sacramento-San Joaquin Delta, hurting California water supplies. The state says its plan to build tunnels around the Delta would help.

<http://www.sacbee.com/news/state/california/water-and-drought/article158679214.html>

Sent from Mail for Windows 10

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