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### RE: American Canyon Solar User Permit Application # P18-00114 – Public Hearing Follow Up

This communication is a follow up to the November 28<sup>th</sup>, 2018 Planning Commission hearing, resulting in a split decision (2-2 vote) and a third hearing in front of the Planning Commission this Wednesday, December 5<sup>th</sup>, 2018. In preparation for this hearing, we want to clarify a few items related to the project:

1. **Discontinuation of horse boarding as existing agricultural use on property:** A Vallejo resident commented that she boards her horse on the project property and that the project would thus discontinue an agricultural use on the property. The current landowner currently maintains a small commercial horse boarding operation on the property. As you know, horse boarding requires a use permit, which this operation does not have. Accordingly, the current horse boarding operation violates the County's AW zoning and is illegal.
2. **A Solar Ordinance:** There are no other pending applications for "electric generating plants" in the County, but there was discussion at the Planning Commission hearing regarding the need for a solar ordinance. Notwithstanding the fact there are no other projects applying for the use, there is not an environmental impact that a new solar ordinance would address, which isn't already addressed in the Development Standards and Conditions of Approval for this project.
3. **California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP):** The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years via a computer mapping system, aerial imagery, public review, and field reconnaissance. Under the California Public Resources Code and the California Environmental Quality Act (CEQA), the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land constitute "agricultural land" (Public Resources Code Section 21060.1). The subject property is categorized as "Other Land," – meaning the Department of Conservation doesn't categorize the project property as "agricultural land" and it does not constitute "agricultural land" for purposes of CEQA.

4. **Public Benefits:** The American Canyon Solar project provides a multitude of public benefits to the County at no cost:
- a. Electricity from the project will power 1,000 homes locally as the energy produced by the project will be consumed by those users closest to its' generation
  - b. The project is in partnership with the Workforce Alliance of the North Bay, providing for local training for 21<sup>st</sup> Century jobs in the renewable energy field
  - c. Low impact development with no additional draw on water, sewer, school, fire or other public services
  - d. Clean reliable energy that will serve to stabilize the local grid
  - e. No impacts to neighbors

Climate change is a global problem that requires local solutions. This project is an opportunity for Napa to be part of the solution. The time to fight climate change is now and decisions on a local level can either facilitate this effort or discourage it. SB 100 (100% clean energy goal) was enacted earlier this year and this project is a step in the right direction. This project is absolutely critical to helping the County meet the objectives set out in its Climate Action Plan.

There are no other pending solar electric generating plant use permit applications with the County. This is the only near-term action the County can take towards fighting climate change as the project is set to start construction after the new year. With the federal investment tax credit (a key financial incentive needed for these projects to pencil) set to step down in 2020, the time to act on solar is now.

In conclusion, the American Canyon Solar Project is consistent with both the Napa County Zoning Ordinance and General Plan and the Renewable Properties team has relied on the County's existing laws and policies in the development of this project. It's our sincere hope that the Planning Commission will support this project and renewable energy by voting to approve the American Canyon Solar Project.

Please don't hesitate to reach out with any questions or comments. We look forward to continuing our work with you.

Sincerely,

**RENEWABLE PROPERTIES**



Aaron Halimi  
President