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Supplemental Notice of Public Review

Climate Action Plan for Unincorporated Napa County

On January 28, 2011, the Napa County Department of Conservation, Development & Planning, released a draft Climate Action Plan for the unincorporated Napa County. The notice of release indicated that the Planning Commission would conduct a public hearing on the draft plan on February 16, 2011, and specified that written comments and questions from the public were due by March 7, 2011. In discussions with several interested groups and individuals, we have already received some excellent input and feedback. We wanted to share some of these questions and answers with a larger audience in order to further the discussion process.

Question 1: Is it possible to extend the comment period?

Answer: Several groups reviewing the plan have indicated that they need time to not only review the plan, but also meet with their various Boards and stakeholders. While this review process is valuable, it also takes time. As such, the County has decided to extend the comment period an additional month, to the close of business on **April 4, 2011. This due date would facilitate returning to the Planning Commission on April 20, 2011.**

Question 2: Can you provide a brief explanation of why it appears that vineyard projects have to offset 51.5% of their project specific emissions while other development projects only have to reduce 5.5% of their emissions?

Answer: The plan attempts to have each sector mitigate for its own impacts (i.e. vineyards are not being asked to account for emissions increases due to buildings or transportation). The impacts that vineyards as being asked to account for can be found in Table ES-1 as follows:

- On line 10 of the table, it can be seen that agricultural vehicles account for a 6570 metric ton increase (subtracting the 2005 baseline of 31,820 from the 2020 projection of 38,390).
- Looking at the next section of the same table, changes in carbon sequestration (lines 14 and 15), as well as the stock loss resulting from land conversion from vineyards (line 17) results in an impact of 27,534 metric tons (line 19).
- It is assumed that about 330 tons of the sequestration impact is attributable to non-vineyard development (although this isn't explicitly shown on the table), so the net impact from agriculture is calculated to be $6570 + 27,534 - 330 = 33,774$ metric tons, which is what vineyards are being asked to provide in reductions/offsets. Vineyard-related emissions constitute approximately 20% of the

total increase in emissions projected between 2005 and 2020, and about 7% of the total emissions forecast in 2020. These emissions can be eliminated if new discretionary vineyard projects are required to adopt a suite of best management practices, and otherwise reduce/offset their carbon impact by 51.5%. The remaining 49.5% of the impact of each project is covered by the other general reduction measures contained in the plan.

Development of new commercial/industrial buildings is captured in part on line 5 of the Table ES-1, with an increase of $111,060 - 95,320 = 15,740$ metric tons between 2005 and 2020 (approximately 10% of the total increase). Non-residential development projects also contribute to the transportation emissions shown in line 7 ($230,110$ minus $191,270 = 38,840$ between 2005 and 2020). Many of the state mandated reduction measures mitigate these impacts, resulting in a net impact of 10,936 metric tons of reduction needed (see table ES-2). In order to achieve this reduction, development projects are required to replace 100% of the carbon stock removed from the site due to land conversion, build to the recently adopted green building code, and reduce their emissions by an additional 5.5%.

Thus, as written, the plan requires that each type of project take certain actions, and then the necessary percentage specific to that type of project is added on in order to meet the target for that sector. The percentages are different based on sector-specific impacts and the other required actions that are required in that sector. Therefore the simple statement that “agriculture is bearing a heavier burden because vineyards are required to mitigate for 51.5% of its impacts while other development is only required to mitigate for 5.5%”, is false because it fails to account for the total impact of the sector and the other actions required by projects in each sector.

Question 3: Why are vineyard replants not addressed?

Answer: Replants of existing vineyards result in short term emissions due to vine removal and replanting. Larger impacts associated with land conversion and changes in sequestration do not occur, and thus no specific additional actions have been recommended for replants. A similar decision was made to not require specific reductions from other non-discretionary projects such as single family homes, since reductions on these types of projects are achieved through the implementation of various state and local measures, such as the building code and fuel efficiency standards.

Question 4: By relying on aggressive (i.e. large) projections of vineyard development between 2005 and 2020, doesn't the plan end up requiring projects to do more than they need to?

Answer: Not necessarily. While the amount of emissions projected to occur in 2020 as a result of new vineyard development would go down if we assumed less vineyard development, the number of new vineyard projects that could achieve the required reductions would also go down. Changing the amount of vineyard development assumed would make the Climate Action Plan less consistent with the County's General Plan and should be considered carefully. County staff has proposed that the plan be adopted with the current projections of vineyard development (i.e. 6,737 new acres between 2005 and 2020), and then re-evaluated and adjusted in several years if needed. At that point, if we have demonstrated success in reducing emissions, it could make sense to reduce requirements on some projects.

Question 5: Doesn't this plan put additional burdens on new projects? Why do it at all?

Answer: Without a climate action plan, each individual discretionary vineyard project would be required to address carbon emissions on a project by project basis, and would have to conduct an analysis to determine whether emissions would be “cumulatively considerable” under CEQA. In some cases, the most conservative approach from a CEQA perspective would be to reduce or offset emissions by 100% in order to reduce the potential for legal challenges. This plan reduces uncertainties and risks for individual vineyard projects. It has also been crafted to give project applicants the flexibility to meet its requirements in a variety of ways, allowing them to select an emission reduction (or offset) strategy that is consistent with their objectives and lower in cost than other possible strategies.

County staff remains available to answer questions or to present a summary of the proposed Climate Action Plan to your organization or community service group. Please contact Hillary Gitelman at hillary.gitelman@countyofnapa.org or Steven Lederer at steven.lederer@countyofnapa.org.