Planning Commission Mtg. NOV 28 2018 Agenda Item # 7A

From: Morrison, David

To: Smith, Vincent (PBES): Gallina, Charlene; Fuller, Lashun
Subject: FW: Upcoming Solar Planning Commission Meeting
Date: Tuesday, November 13, 2018 12:16:24 PM

Attachments: <u>Draft Date Extension Request.docx</u>

From: Laura Tinthoff **Sent:** Monday, November 12, 2018 1:53 PM **To:** Tran, Minh Minh.Tran@countyofnapa.org

Cc: Morrison, David <David.Morrison@countyofnapa.org> **Subject:** Re: Upcoming Solar Planning Commission Meeting

Thank you, Minh and David. I am not sure how the font sizes of my original letter changed in transit. I have attached a cleaner copy that I would appreciate replacing for the administrative record.

Your prompt attention is very much appreciated.

Sincerely,

Laura Tinthoff 707.339.1481 www.lauratinthoff.com

On Nov 12, 2018, at 11:07 AM, Tran, Minh < <u>Minh.Tran@countyofnapa.org</u>> wrote:

Thanks Laura for your email. I am copying David here so that your comments may be included in the administrative record of any upcoming solar project discussions by the Planning Commission. In addition, we will plan to discuss and consider your request at the next staff meeting.

Thanks again.

Minh

From: Laura Tinthoff lauratinthoff@gmail.com **Sent:** Monday, November 12, 2018 7:40 AM **To:** Tran, Minh Minh.Tran@countyofnapa.org

Cc: Eileen Pereira <<u>eileen@aston.com</u>>; Aston Pereira <<u>aston@aston.com</u>>; kathylynnfelch <<u>kathylynnfelch@gmail.com</u>>; Alan Borem <<u>aborem@sbcglobal.net</u>>; John P. Zimmermann M.D. <<u>john@ascnv.com</u>>; Darlene Meltzer <<u>darlenemeltzer@gmail.com</u>>; Pat Tuck <<u>ptucknapa@gmail.com</u>>; Geni Bennetts <<u>gbennetts@sbcglobal.net</u>>; Charlotte Williams <<u>cdevorak@sonic.net</u>>; Valli Carter

<augusthart@aol.com>

Subject: Upcoming Solar Planning Commission Meeting

Chief Executive Officer, Minh Tran November 12, 2018

Good Morning Minh,

We, as concerned citizens, would like to address a few issues regarding the American Canyon solar application.

While boldly stating that they will approve the project at the next meeting, three of the Planning Commission members, Whitmer, Hansen, and Mazotti, appeared to recognize the need for "future" regulations. Commissioners Gallagher and Chair Cottrell also firmly cited the importance of a "plan" created by the County Planners and the constituents together.

Our question is, when will this joint process start?

In a confusing and troubling statement, Commissioner Whitmer announced,

I think that we "gotta" begin building solar and figure out where those things go, so, hopefully during the Climate Action Plan, we can have those discussions and figure out some ways of doing the land use analysis to prezone where future solar applications should go and maybe more importantly for us, where they should not go. Because I, again, don't believe that every location or application that comes forward is necessarily an appropriate application. But I am in favor of this particular application and plan to support it when it comes back to the Commission.

This statement connotes that the County plans to approve the AC project, learn from probable mistakes, and *perhaps*, create some regulations in the future.

For months the community has emphatically stated that the time for regulations is now. We have started the process on our own and are creating a draft document for the County's input and approval. We are educating ourselves on the specific characteristics of Napa County and that which we can learn from nearby county ordinances that have been in place for several years. With this in mind, we are asking for an extension of the November 28, solar discussion and vote. We need time to work together to form a plan

solar discussion and vote. We need time to work together to form a plan that benefits the entire community, rather than a few County Officials with personal agendas.

Furthermore, as we have seen in the past, the holidays are not a good time to undertake politically controversial issues. We would like to see the date moved to the end of January or later.

We look forward to hearing from you, Minh. We are happy to meet with you in person to further discuss this critical issue. Sincerely,

Laura Tinthoff on behalf of Napa Residents for Smart Planning 707.339.1481

Chief Executive Officer, Minh Tran

Good Morning Minh,

We, as concerned citizens, would like to address a few issues regarding the American Canyon solar application.

While boldly stating that they will approve the project at the next meeting, three of the Planning Commission members, Whitmer, Hansen, and Mazotti, appeared to recognize the need for "future" regulations. Commissioners Gallagher and Chair Cottrell also firmly cited the importance of a "plan" created by the County Planners and the constituents together.

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We look forward to hearing from you, Minh. We are happy to meet with you in person to further discuss this critical issue.

Sincerely,

Laura Tinthoff on behalf of Napa Residents for Smart Planning

From:

Morrison, David Smith, Vincent (PBES); Gallina, Charlene; Fuller, Lashun To:

Subject: FW: Request to postpone approval Tuesday, November 13, 2018 5:46:21 PM Date:

Sent with BlackBerry Work (www.blackberry.com)

From: Charlotte Williams < cdevorak@sonic.net >

Date: Tuesday, Nov 13, 2018, 5:40 PM

To: Whitmer, David Dave.Whitmer@countyofnapa.org>, joellegPC@gmail.com <joellegPC@gmail.com>, anne.cottrell@lucene.com <anne.cottrell@lucene.com>

Cc: Dillon, Diane DilLoN@countyofnapa.org, Alfredo Pedroza Alfredo Pedroza Alfredo Pedroza Alfredo Pedroza Alfredo Pedroza Alfredo Pedroza Alfredo Pedroza@countyofnapa.org, Wagenknecht, Brad

- $<\!\!\underline{BRAD.WAGENKNECHT@countyofnapa.org}\!\!, Gregory, Ryan <\!\!\underline{Ryan.Gregory@countyofnapa.org}\!\!>\!\!, Ramos, Belia <\!\!\underline{Belia.Ramos@countyofnapa.org}\!\!>\!\!, Tran, Minhard Countyofnapa.org, Count$
- <<u>Minh.Tran@countyofnapa.org</u>>, Morrison, David <<u>David.Morrison@countyofnapa.org</u>>, Cynthia Grupp <<u>cfgrupp@gmail.com</u>>, Patricia Damery
- $Mufson < \underbrace{kingsbridgedan@gmail.com}, Jim Wilson < \underbrace{iplaudatosi@gmail.com}, kathy >> Felch Kathy < \underbrace{kathy@kathylynnfelch.com}, Charlotte Helen Williams < \underbrace{kathy@kathy@kathylynnfelch.com}, Charlotte Helen Williams < \underbrace{kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kathy@kath$ <cdevorak@sonic.net>, Ginna Beharry <ginna.beharry@sbcglobal.net>, George Caloyannidis <calti@comcast.net>

Subject: Request to postpone approval

Dear Napa County Planning Commission,

On behalf of Napa Vision 2050 I respectfully request that you postpone any meetings or hearings regarding approval of any proposed solar energy production facilities until at least January 2019 to allow for county government and all concerned to develop sound and thorough regulations for this proposed type of land use.

Thank you for your time and attention working on this important issue.

Sincerely,

Charlotte Helen Williams, president Napa Vision 2050 707-889-1788 cdevorak@sonic.net

This email has been checked for viruses by Avast antivirus software.

https://urldefense.proofpoint.com/v2/url?u=https-

3A_www.avast.com_antivirus&d=DwICaQ&c=yU98RTqmkHZnyr3K3nExYR0AsYvCxdg1GRVyYwwHmM0&r=GS60FARFBBJ5iQOf3lXxrOF2QVS- $Rl6XpsBIO_792A4\&m = YCchLM4gS64aWg-ktDKzYeSvpR9ltD2g_zlDtSzYqvA\&s = JLUGPfKi_ocfaHNgDqSPsC25gRmtZb25m9mtpi42xPw\&e = VRSPsC25gRmtZb25m9mtpi42xPw&e = VRSPsC25gRmtDA25gRmtDA25gRmtDA25gRmtDA25gRmtDA25gRmtDA25gRmtDA25gRmtDA25$

From: <u>Patricia Tuck</u>

To: joelle.gallagher@countyofnapa.org; jenGillPC@outlook.com; Mazotti, Andrew; Morrison, David; Cottrell, Anne;

Anderson, Laura; Whitmer, David; Smith, Vincent (PBES); Fuller, Lashun

Subject: Solar Projects

Date: Sunday, November 25, 2018 5:41:19 PM

Attachments: Solar projects.ltr.docx

Dear Commissioners and staff:

Attached is a copy of the letter I sent to the Board of Supervisors, Assemblywoman Aguiar-Curry, Senator Dodd, and Brad Onorato, Mike Thompson's District Representative. I appreciate your attention to these matters.

Sincerely,

Patricia Tuck

Napa County Board of Supervisors 1195 Third Street Suite 310 Napa, CA 94559

November 25, 2018

Dear Supervisors and Support Staff:

As you are undoubtedly aware, Marin Clean Energy is proposing two large scale solar installations in Napa County: one in a rural residential neighborhood off First Avenue (13.5 acres on a 17 acre AW, residential parcel); the other in American Canyon (17.93 acres on a 21 acre AW residential parcel). There is overwhelming opposition to the first project by neighbors, but the second, larger project is not raising the same concerns. That concerns me.

Having attended several planning sessions as part of the development of Napa County's new action plan, neighborhood meetings about the First Avenue project, and two planning

commission meeting during which the solar projects were discussed, it is abundantly clear that the people responsible for Napa County planning do not have a regulatory infrastructure to assess, plan, build, monitor, maintain, and/or remove solar installations of this size. As was stated by a planning staff member during a meeting on July 27, 2018 "The magnitude of this project is beyond the scope of our existing zoning code."

My suggestion, therefore, is to put the entire permit/planning process for these projects on hold until these regulations have been developed, approved and adopted, and can be used to guide such decisions. Given that Solano and Sonoma County have done so and that the State and private sector provide ample guidelines and support—I find no reasonable need for rushing these projects. The kind of rationale stated by a planning commissioner on October 17, 2018 exemplifies my concerns:

"I think that we gotta (sic) begin building solar and figure out where those things go, so, hopefully, during the Climate Action Plan, we can have those discussions and figure out some ways of doing the land use analysis to pre-zone where future solar applications should go and maybe more importantly for us, where they should not go. Because I, again, don't believe that every location or application that comes forward is necessarily an appropriate application. But I am in

favor of this particular (American Canyon) application and plan to

support it when it comes back to the Commission."

Surely, this "logic" cannot be the basis for making decisions for our

county.

Solar energy and other forms of renewable energy are essential

components as Napa County prepares for a sustainable future.

However, without careful planning, which preserves the exceptional

beauty and resources of our community, serious, irreversible

consequences are likely.

Sincerely,

Patricia Tuck

Citizens for Smart Planning

With the support of: Napa

Farm Bureau, Napa Vision 2050



October 25, 2018

Napa County Planning Commission, 1195 3rd Street, Suite 210, Napa, CA 94559

Dear Napa County Planning Commission,

I am writing this letter to share how the Renewable Properties American Canyon Solar Project located at 2180 American Canyon Road, American Canyon, CA. can be leveraged on behalf of job seekers in Napa County. The Workforce Alliance of the North Bay sees this project as an opportunity to introduce the local workforce to job opportunities in the solar and renewable energy field. We believe that we can leverage the project to provide real work experience for residents that may be looking to start careers in solar and renewable energy. In line with this project, the Workforce Alliance of the North Bay is considering the following partnership opportunities with the project development and construction managers.

- 1. WANB could coordinate with the project to design a work experience engagement of up to three months later this fall where RPCS would be the employer of record.
- 2. WANB could advertise locally as well as with our network of community partners to bring in job seekers that are interested in learning more about or breaking into the construction or solar industry.
- 3. WANB can have its local job center, CareerPoint Napa, screen local job seeking caseloads for job seekers that are interested in a paid work experience engagement and assist with training costs of eligible individuals.

After speaking with the project representatives, we believe that the contractors for this project are committed to a local workforce and leveraging the project as a training pipeline of future workers in the solar and renewable energy field.

We believe this project represents a good first step toward continued development of job seekers with the requisite job skills necessary in the solar and renewable energy field and look forward to potentially working with representatives to do that very thing.

Sincerely,

Bruce Wilson,
Executive Director

 From:
 Smith, Vincent (PBES)

 To:
 Fuller, Lashun

 Cc:
 Gallina, Charlene

Subject: FW: "Quasi-Utility" Defined

Date: Monday, November 26, 2018 3:09:46 PM

Attachments: Quasi-Utility Defined.docx

An additional communication for Item 7.77.

From: Laura Tinthoff < lauratinthoff@gmail.com> **Sent:** Monday, November 26, 2018 2:35 PM

To: Joelle.Gallagher@countyofnapa.org; Smith, Vincent (PBES) <Vincent.Smith@countyofnapa.org>; Mazotti, Andrew <Andrew.Mazotti@countyofnapa.org>; Morrison, David

<David.Morrison@countyofnapa.org>; Whitmer, David <Dave.Whitmer@countyofnapa.org>; Cottrell, Anne <Anne.Cottrell@countyofnapa.org>; Planning <planning@countyofnapa.org>; JeriGillPC@outlook.com; Pedroza, Alfredo <Alfredo.Pedroza@countyofnapa.org>; Ramos, Belia <Belia.Ramos@countyofnapa.org>; Wagenknecht, Brad

<BRAD.WAGENKNECHT@countyofnapa.org>; Valdez, Jose (Louie) <Jose.Valdez@countyofnapa.org>;
Gregory, Ryan <Ryan.Gregory@countyofnapa.org>; Dillon, Diane

<Diane.DILLON@countyofnapa.org>; Tijero, Jesus <Jesus.Tijero@countyofnapa.org>; Cortez, Nelson
<Nelson.Cortez@countyofnapa.org>; Tran, Minh <Minh.Tran@countyofnapa.org>; Anderson, Laura
<Laura.Anderson@countyofnapa.org>; ClerkoftheBoard <clerkoftheboard@countyofnapa.org>

Subject: "Quasi-Utility" Defined

Dear County Officials,

I want to shed some light on a matter that has come to my attention stemming from my discussions with many of you privately and publicly at the Strategic Plan meetings. There has been a broad misunderstanding of the nature of the proposed commercial solar "quasi-utility".

Most of us have had a good laugh over, "What is a "quasi-utility?". Please read the attached document; it is a game-changer.

We look forward to an intelligent and responsible decision at the Wednesday Planning Commission meeting.

Sincerely,

Laura Tinthoff 707.339.1481 www.lauratinthoff.com We have been informed by several County officials as well as County Counsel, Laura Anderson, that the General Plan Policy AG/LU-29 "contemplates" allowing public utility uses in appropriate locations. In an e-mail dated November16 Laura stated,

"As to your first question, it's difficult to reply to your hypothetical because all projects are considered on their own merits or lack thereof. The County's General Plan does provide staff with guidance, though it may not be as robust as some folks would like. As discussed in the staff report, General Plan Policy AG/LU-29 contemplates allowing public utility uses "in appropriate locations." Staff must evaluate an application and make a recommendation whether the project is consistent with this policy. The Commission must then weigh this recommendation and determine whether the project is consistent with this policy and in harmony overall with the General Plan as a whole. Staff may review a future solar application at a different location, with a similar zoning and General Plan designation, and advise that based on some other site specific or locational factors, the location would not be appropriate and therefore inconsistent with AG/LU-29."

Renewable Properties, LLC is not a "public utility".

Renewable Properties, LLC., is a privately-owned corporation that designs and builds solar installations to manufacture electricity. This distinction is critical. A solar "farm" is a **manufacturing facility**.

As stated by Mr. Halimi, Renewable Properties, LLC is a "quasi-utility". Until now, no-one I have spoken with has had any idea what that title means. Countless people have asked me what a "quasi-utility" is and I laughed it off as a "sort-of-utility".

When I read the aforementioned e-mail, I realized that major decisions were being made based on General Plan "public-utility" verbiage. Yet the developer calls it a "quasi-utility". I spent several hours researching this obscure term. It is no longer a joke.

A "quasi-utility" is an entirely different entity than a public utility. It is a deceptive expression for a project that is not a "public utility" in any sense of the words. With no experience and no regulations in place, we have unknowingly been deceived by an industry that is deliberately coining new and duplicitous terms.

A "quasi-utility" is, in actuality, a company that manufactures supplies for a utility company.

Tesla is another example of a company deemed a "quasi-utility". Tesla has partnered with Solar City, a solar developer, to manufacture and sell batteries and solar panels. Solar City, also a "quasi-utility", then provides electricity to Nexergy, a community energy retailer.

"CEO Elon Musk has also been busy charging towards this week's shareholder approval for the merger of Tesla and Solarcity. The \$2b deal has, according to Bloomberg New Energy Finance, given "Tesla has the **product suite and resources** to evolve into a quasi-utility".¹

The Rhode Island Supreme Court defines the situation clearly. The Providence Journal reported:

"Van Couyghen (the Supreme Court Justice) cited a previous case in which the state Supreme Court found that wind turbines represented a manufacturer because they are used for the sole purpose of transforming raw materials, "namely wind — into a finished product — namely electricity."

"Thus, even though the [zoning] board found that the proposed solar farm was similar to a public utility, it would be, in fact, a manufacturing facility because it would transform sunlight into electricity ... manufacturing is expressly prohibited in residential zones under the ordinance. As a result, the granting of a special use permit for a manufacturing facility — the solar farm — was clearly erroneous."²

¹ https://medium.com/@Nexergy/the-age-of-the-quasi-utility-f83e38029b02

 $^{^{2}\ \}underline{http://www.providencejournal.com/news/20180730/judge-reverses-zoning-boards-ok-of-solar-farm-in-portsmouth}$

As the Rhode Island case suggests, this uncharted development carries the potential of years of legal battles.

Even the basic definition of a "solar-farm" or "utility-scale solar power plant" confirms this distinction as well.

"A utility-scale solar power plant can be one of several solar technologies – concentrating solar power (CSP), <u>photovoltaics (PV)</u>, or concentrating photovoltaics (CPV). What distinguishes utility-scale solar from <u>distributed generation</u> is project size and the fact that the electricity is sold to wholesale utility buyers, not end-use consumers."³

Approval of the project sets a frightening precedent for our County's economic and environmental future. The misrepresentation of the basic facts of this project to a community that has no former experience or regulations reflects poorly on the business practices of both Renewable Properties, LLC and MCE. It is up to each of you to determine how it reflects on our County Government.

Contrary to other controversial issues such as cannabis dispensaries, not one resident has spoken in favor of large-scale solar projects with no regulations in place. Before any commercial project is approved, you must to take time to become educated, listen to the citizens and put aside special interests. It is simple common-sense.

Scientific research reveals a significant difference between a "public utility" and a privately developed solar installation. The distinction is clear that a manufacturing site is not the proper use for an Agricultural Reserve and Agricultural Watershed zoning designation.

We, the concerned citizens, are merely asking for laws to be established to protect our watershed, viewshed, property values, and quality of life.

Sincerely,

Laura Tinthoff, on behalf of Napa Residents for Smart Planning with the support of Napa County Farm Bureau and Napa Vision 2050

Napa

 $^{^{3} \ \}underline{https://www.seia.org/initiatives/utility-scale-solar-power}$

 From:
 Smith, Vincent (PBES)

 To:
 Fuller, Lashun

 Cc:
 Gallina, Charlene

Subject: FW: American Canyon Solar Project

Date: Monday, November 26, 2018 3:38:23 PM

An additional comment for the 11/28 Planning Commission agenda item 7.77.

From: Roy Bukstein <roybuk@yahoo.com>
Sent: Monday, November 26, 2018 3:36 PM

To: Mazotti, Andrew <Andrew.Mazotti@countyofnapa.org>; joellegPC@gmail.com; Whitmer, David

<Dave.Whitmer@countyofnapa.org>; anne.cottrell@lucene.com; jerigillpc@outlook.com

Cc: Smith, Vincent (PBES) < Vincent. Smith@countyofnapa.org>

Subject: American Canyon Solar Project

Dear Napa County Planning Commissioners,

As the CFO of Oakville Ranch Vineyards LP, a Napa County vineyard that's been in operation for over 30 years, I want to express my support for the American Canyon Solar Project. Since 2005 Oakville Ranch Vineyards has used solar panels on the vineyard grounds to power our irrigation pumps.

It is my understanding you are voting on Wednesday November 28th to approve this project. It is my belief this project is a good use for this land and appropriately sited.

It is without question that investing in renewable energy projects is critical to reduce our reliance on fossil fuels. Solar is a low impact development and a great use for this site. I ask that you approve this project.

I understand that the only opposition to the project is a group that acknowledges the importance of renewable energy projects yet uses the typical Not-In-My-Backyard or NIMBY as their argument to reject this project. In my opinion this is a fallacious argument with no substance.

As individuals and community citizens we need to show others that we can and will "step-up" and commit to an appropriate level of responsibility and resources to embrace projects like the American Canyon Solar Project. It's quite simple, how can we ask other communities to do their part when we won't do ours? *The American Canyon Solar Project will generate electricity in Napa county that will be used by Napa county residents*.

It's the right solar project for the right time in the right location. Please approve this project on November 28th.

Sincerely,

Roy Bukstein Chief Financial Officer

Oakville Ranch

Vineyards, LP

Roy Bukstein roybuk@yahoo.com

Oakville Ranch Vineyards LP 7781 Silverado Trail Napa, CA. 94559 415-356-2012 or 707-944-9665 From: Smith, Vincent (PBES)
To: Fuller, Lashun
Cc: Gallina, Charlene

Subject: FW: Support of the American Canyon Solar Project

Date: Monday, November 26, 2018 4:11:02 PM

An additional communication for the 11/28/18 Planning Commission agenda item 7.77.

----Original Message-----

From: Nelson Del Rio <nelson.delrio@icloud.com>

Sent: Monday, November 26, 2018 3:58 PM

To: Mazotti, Andrew <Andrew.Mazotti@countyofnapa.org>; joellegPC@gmail.com; Whitmer, David

<Dave.Whitmer@countyofnapa.org>; anne.cottrell@lucene.com; jerigillpc@outlook.com

Cc: Smith, Vincent (PBES) < Vincent. Smith@countyofnapa.org>; Morrison, David

<David.Morrison@countyofnapa.org>

Subject: Support of the American Canyon Solar Project

Planning Commissioners,

We are emailing you today in support of the American Canyon Solar Project. Permitting the creation of renewable energy projects is essential if communities are to reduce reliance on fossil fuels and assist California in achieving its renewable energy goals. We believe this project is appropriately sited, is a low impact development, and a perfect use for this site. We ask that you approve this project.

Best

Nelson, Aleen, and Jhila

Nelson Del Rio 2180 American Canyon Rd American Canyon, CA

Aleen Del Rio Barrow 2180 American Canyon Rd American Canyon, CA

Jhila Zarebi (Trustee of Landowner) 2180 American Canyon Rd American Canyon CA
 From:
 Smith, Vincent (PBES)

 To:
 Fuller, Lashun

 Cc:
 Gallina, Charlene

Subject: FW: American Canyon Solar Project

Date: Tuesday, November 27, 2018 8:21:42 AM

Attachments: Letter to County PC re AmCyn Solar.docx

An additional comment for the Planning Commission meeting tomorrow.

From: Eve Kahn <evekahn@yahoo.com>
Sent: Monday, November 26, 2018 7:30 PM

To: Smith, Vincent (PBES) < Vincent. Smith@countyofnapa.org>

Cc: Mazotti, Andrew <Andrew.Mazotti@countyofnapa.org>; Anne Cottrell

<anne.cottrell@lucene.com>; Dave Whitmer <whitmer25@gmail.com>; Joelle Gallagher

<joellegpc@gmail.com>; jerigillpc@outlook.com

Subject: American Canyon Solar Project

Unfortunately I will be out of town on Wed. Please accept my letter as public comments. I would appreciate responses to the questions I raised - a few from previous meeting..

Thanks and regards, Eve



November 26, 2018

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

RE: American Canyon Solar Project

Dear Chair Cottrell and Fellow Commissioners:

Thank you for providing an opportunity to consider my comments. Unfortunately, I have to be out of town on Wednesday but hope you can address the following questions and concerns during your meeting.

- 1. **Clarification on the sound/noise metrics:** At the last meeting the applicant said the 37db sound is equivalent to a cycling refrigerator. If the 37db sound is coming from just the panel trackers, what is the **cumulative** sound from the 12,000+ panel trackers and 66 string inverters?
- 2. Clarification on the maximum solar-generated electricity for the Napa grid: The applicant said it was unrealistic to presume many more solar production facilities would be approved in Napa as there is a limit imposed by the existing grid. What is that limit? The staff report indicates this production facility will generate 3 MW of AC power. What is the total output of this project in American Canyon, applicant's Palm Drive project, and another on Napa Sanitation ponds? Will three solar production facilities in South Napa County overwhelm the existing grid?
- **3.** Clarification on the existing code exceptions that allows approval WITHOUT LIMITATION. What does this really mean? Does this impact the conditions of approval? Does this mean that the County's current rules on setbacks etc. do not apply? Does this mean that this facility can continue to use an offsite well when other uses may/would require a water source on-site. Please clarify.
- **4. Need for appropriate application, regulations, and guidelines**: A few of the commissioners at the last meeting strongly agreed there is a need to establish a framework for renewable energy proposals. But no reason or rationale was provided to justify an approval on this project prior to these being in place. I use the current example of a cannabis ordinance. Twice the BOS have delayed as they realized the need for a well thought out ordinance that balances the needs of the industry, residents and visitors. What is the rush to judgement on the proposal before you now?

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