



A Tradition of Stewardship
A Commitment to Service

Planning, Building & Environmental Services
1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org
David Morrison
Director

MEMORANDUM

To: Napa County Planning Commission	From: David Morrison, Director
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Date: February 20, 2019	Re: Supplemental Information: Final Draft Water Quality & Tree Protection Ordinance
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Attached for Commission review is additional Public Correspondence that was received after the Planning Commission Packet was posted on Tuesday, February 12, 2019 (Attachment A). Also attached are Graphics prepared for presentation of the Final Draft Ordinance (Attachment B).

If you have any questions, please do not hesitate to contact me.

Attachments

“A”

Public Comments
Received After Packet
2/12/19 – 2/22/19

Thepkaisone, Cesselea

From: Bordona, Brian
Sent: Thursday, February 14, 2019 1:32 PM
To: Thepkaisone, Cesselea
Subject: FW: Sierra Club comments on Watershed Ordinance attached
Attachments: 021119CommentsFromSCEXComFINAL.docx

From: Chris Benz <100cbbenz@gmail.com>
Sent: Thursday, February 14, 2019 10:01 AM
To: Wagenknecht, Brad <BRAD.WAGENKNECHT@countyofnapa.org>; Dillon, Diane <Diane.DILLON@countyofnapa.org>; Pedroza, Alfredo <Alfredo.Pedroza@countyofnapa.org>; Ramos, Belia <Belia.Ramos@countyofnapa.org>; Gregory, Ryan <Ryan.Gregory@countyofnapa.org>; joellegPC@gmail.com; Whitmer, David <Dave.Whitmer@countyofnapa.org>; anne.cottrell@lucene.com; Mazotti, Andrew <Andrew.Mazotti@countyofnapa.org>; JeriGillPC@outlook.com; Morrison, David <David.Morrison@countyofnapa.org>
Subject: Sierra Club comments on Watershed Ordinance attached



P.O. Box 5531, Napa, CA 94581
www.sierraclub.org/redwood/napa
napavalleyclub@gmail.com

February 11, 2019

To: Napa County Board of Supervisors and Napa County Planning Commissioners
Re: 2019 Watershed Ordinance Comments

The Napa Group of the Sierra Club applauds the Napa County Board of Supervisors for its rapid action on increasing protections for Napa County's watershed. The proposed ordinance, reflects a serious response to voter support for Measure C, and to comments received during the community engagement sessions that resulted in the 2019-2022 Strategic Plan "Vibrant and Sustainable Environment" pillar, which "preserves...and conserves resources for future generations."

We respectfully request that you consider the following general and specific comments.

The most profound threat facing Napa County's environment, our agricultural economy, and future generations is climate change. We have already experienced drought, warmer temperatures, and wildfires brought on by this. In response to this threat, we need to act decisively now to make our watershed, and the ecosystems it harbors, as resilient as possible to warming temperatures and changing climatic conditions. The proposed ordinance should protect the vital role of carbon sequestration that our forests and woodlands provide.

According to the Draft Napa County Climate Action Plan, Revised Final Technical Memo #1 (page 22), oak woodlands sequester almost 25 times more carbon than non-vineyard croplands and 126 times more carbon than vineyards (per acre per year). Coniferous forests sequester 38 times the carbon as non-vineyard croplands and 195 times the carbon as vineyards. And we believe that these sequestration estimates are low. To stabilize our climate, we need to prevent or realistically mitigate any loss in carbon sequestration and drastically reduce destruction of remaining forest resources.

Specific comments on the proposed ordinance:

- A minimum of 85% of the forest canopy should be retained throughout the Ag Watershed in unincorporated areas of the county. The proposed 70% retention rate – allowing removal of 30% of the forest canopy – may sound like a reasonable compromise, but is not environmentally sound or responsible. Even 30% removal can

result in serious habitat fragmentation that can result in significant ecosystem decline. And the county must bear in mind the amount of forest canopy that has *already been removed* as a result of vineyard and housing development. There is simply no imperative to continue to allow large-scale canopy removal.

- The 3:1 mitigation through on-site protection, while not replacing the loss of carbon sequestration, should be confined to developable land only and not allowed on slopes >30% where forest canopy is effectively protected from agricultural development.
- Additional setbacks from wetlands (150 feet rather than the proposed 50 feet) and municipal reservoirs (500 feet minimum rather than the proposed 200 feet) would further protect the ecosystem's ability to filter out sediment and other pollutants from our local water supply. We must do everything we can now to protect this precious water supply, which is increasingly threatened in a warming world.

We ask that you strengthen the protections in the proposed ordinance along these lines to make it more effective in protecting Napa's climate, environment, and economy for the long term.

Sierra Club Napa Group Executive Committee

Xulio Soriano, Chair

Chris Benz

Annette Krammer

Tony Norris

Tom Clark

Diane Shepp

From: [Morrison, David](#)
To: [Fuller, Lashun](#); [Bledsoe, Teresa](#)
Cc: [Anderson, Laura](#); [Bordona, Brian](#); [Gallina, Charlene](#); [Sharp, Leigh](#)
Subject: FW: Preserving the forests and hillsides in Napa County
Date: Thursday, February 14, 2019 3:25:16 PM

-----Original Message-----

From: Lynn Wyman <augiemac1@sbcglobal.net>
Sent: Thursday, February 14, 2019 2:55 PM
To: Morrison, David <David.Morrison@countyofnapa.org>
Subject: Preserving the forests and hillsides in Napa County

I support the nine points made by the Growers/Vintners for responsible agriculture. Please recommend approval of these nine points to preserve the woodlands and watershed areas in Napa County.

Sincerely,
Lynn Wyman

Sent from my iPhone

From: Gallina, Carlene
To: [Gallina, Charlene \(Charlene.Gallina@countyofnapa.org\)](mailto:Gallina, Charlene (Charlene.Gallina@countyofnapa.org))
Subject: FW: 1/29/2019 BOS Meeting - Additional Watershed Protection Correspondence
Date: Friday, February 15, 2019 2:47:00 PM

From: Randy Gularte <r.gularte@ggsir.com>
Sent: Tuesday, February 12, 2019 11:33 AM
To: Tijero, Jesus <Jesus.Tijero@countyofnapa.org>
Cc: Randy Gularte <r.gularte@ggsir.com>
Subject: Bella from Randy Gularte

Bella

I and many of my Realtors have a real concern on the new conservation regulations being proposed. HOWEVER, our main issue is the proposed new regulations do not exempt the right to build a single family home on each parcel.

This needs to be stated clearly that every parcel of land in the County of Napa has the right to build a single family home.

I hear that these new regulations intent is not to prevent the building of a single family home on each parcel BUT it does not state that specifically.

Please make sure this is in the new regulations, many of them I do not support, but at least protect the single family home owner.

Thanks

Randy Gularte

“B”

Graphics

The graphics utilize an actual 220-acre parcel within the county containing a mix of forested, shrub, and grassland for purposes of illustrating how vegetation retention requirements and 3:1 mitigation ratio may be applied.

The first graphic simply shows the land cover types within the 220-acre parcel, regardless of land use constraints such as over 30 percent slopes and stream setbacks.

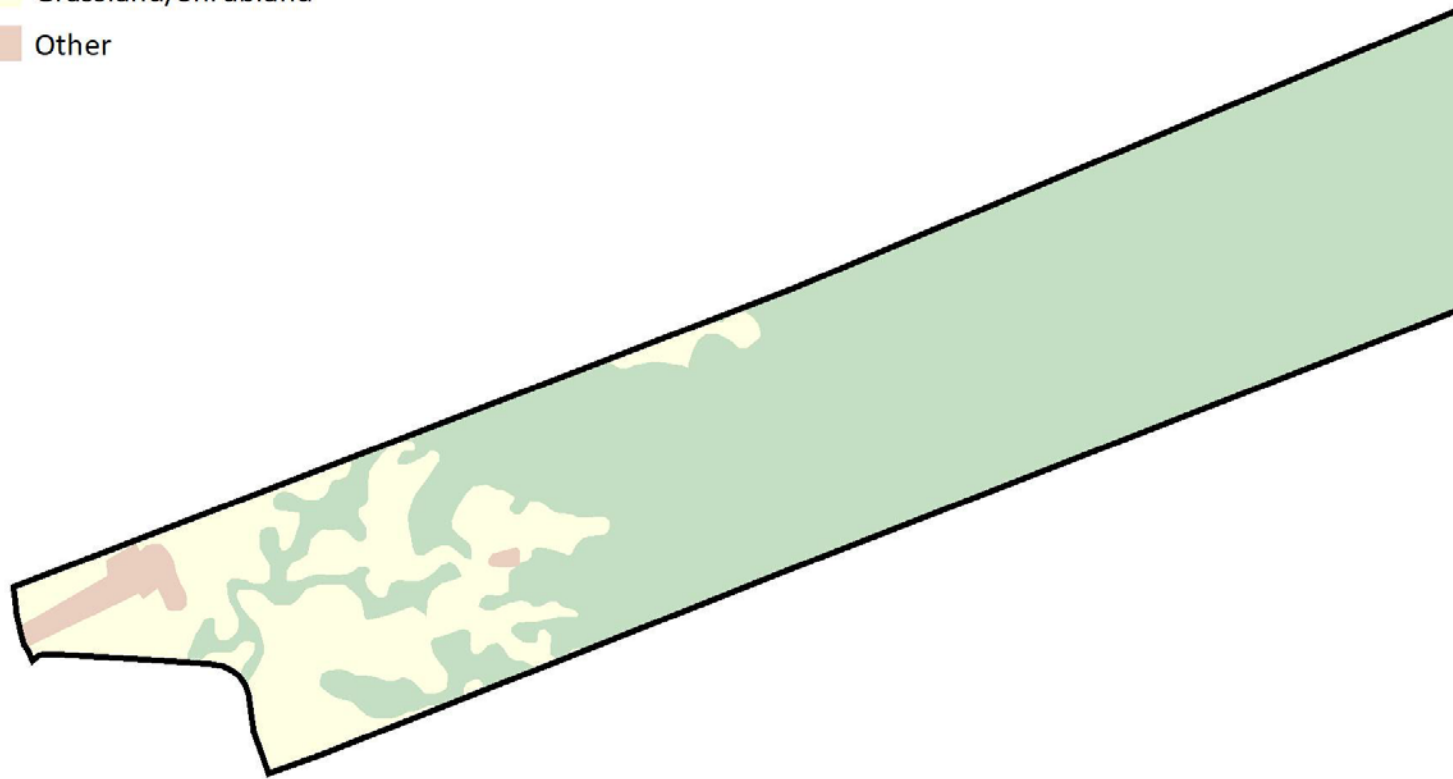
The second graphic identifies all areas within the parcel that are considered potentially plantable (68 acres), which generally includes areas less than 30% slope and outside of stream setbacks.

The remaining graphics illustrate how vegetation retention rates of 60%, 70% and 85% canopy/forest retention is applied along with a requirement to mitigate canopy/forest at a 3:1 ratio in acres. The areas identified as PPS Developed represent the maximum developable area footprint of the property at the given retention requirements.

Using the vegetation retention @ 70-40 graphic as an example, the maximum project size is 29.6 acres. Applying a 70% canopy/forested retention requirement results in a maximum developable area within the canopy/forested areas of 9.2 acres (or 30%). Applying a 3:1 canopy/forest preservation mitigation ratio results in the need to identify 27.6 acres of canopy/forest area for preservation within the parcel. The 220 acre parcel contains 21.5 acres of canopy/forested area on slopes less than 30% and outside of stream setbacks. Assuming those areas are selected for preservation, an additional 6.1 acres of canopy/forest would be needed in order to achieve the required 27.6-acre preservation area. This could be accomplished through reducing the project acres within the canopy/forested area, or selecting areas on slopes greater than 30% within the parcel to be included in the preservation area, or preserving areas off-site. In order to serve as mitigation, the areas selected for preservation would need to be of equal or greater biological value relative to the areas removed as part of a given project.

Landcover Category, parcel-wide




- Forested
- Grassland/Shrubland
- Other

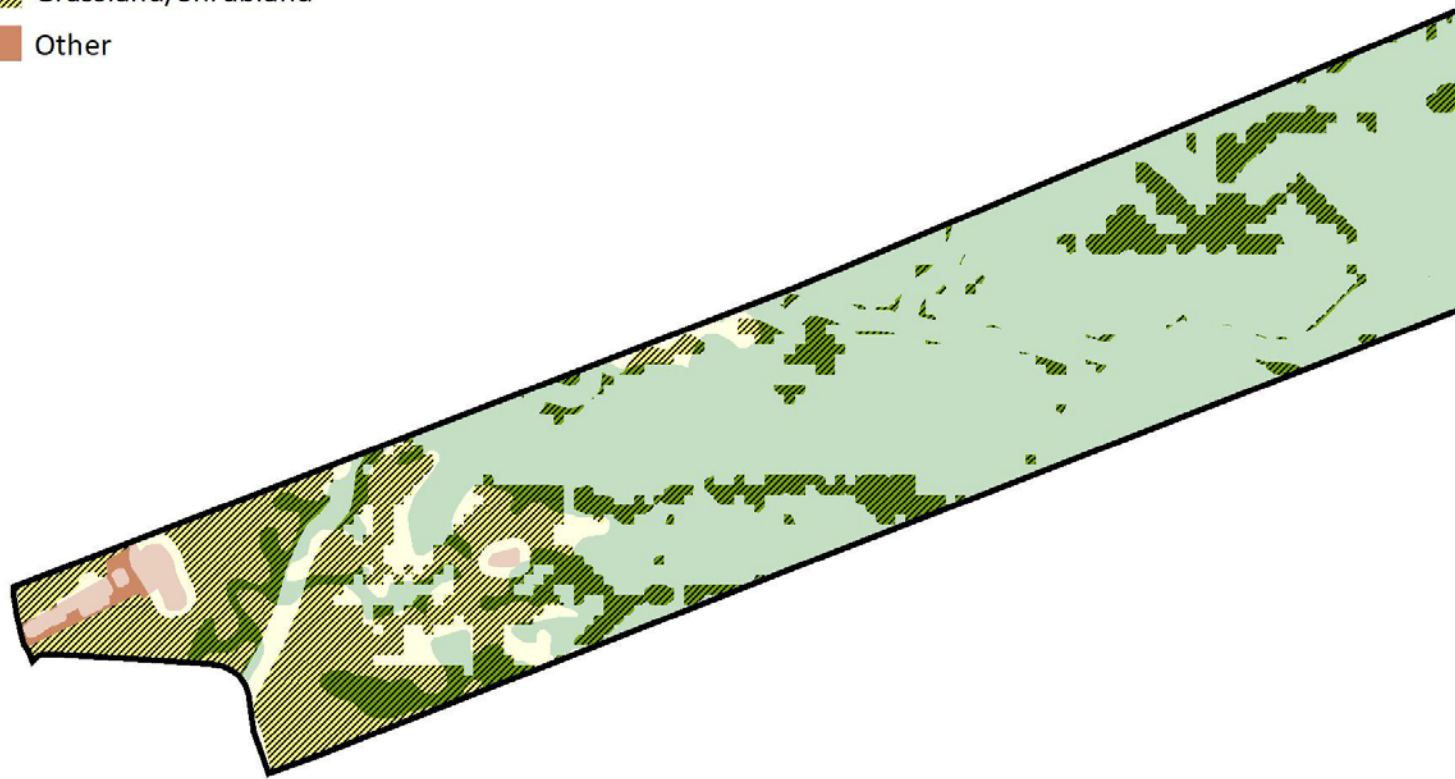


PARCEL SIZE:	220 ac
TOTAL FORESTED:	172 ac (78%)
TOTAL GRASS/SHRUBLAND:	44 ac (20%)

EXISTING CONDITIONS

Landcover Category Within PPS

-  Forested
-  Grassland/Shrubland
-  Other




TOTAL PPS:	68 ac
FORESTED PPS:	31 ac (18%)
GRASS/SHRUBLAND PPS:	34 ac (77%)

ALL POTENTIALLY PLANTABLE ACRES

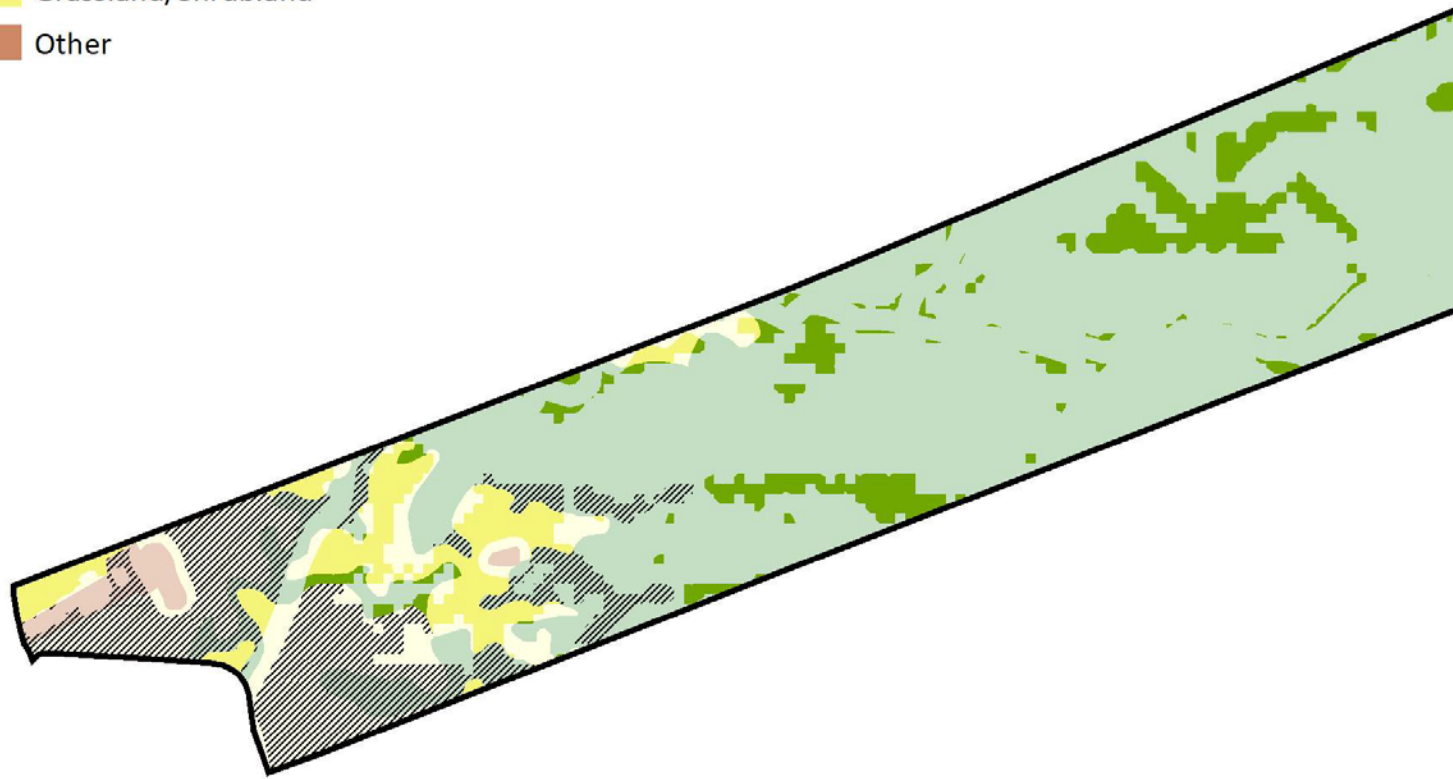
 **PPS Developed**

Landcover Category Preserved Within PPS

 Forested

 Grassland/Shrubland

 Other



TOTAL ACRES DEVELOPED: 32.6 ac

FORESTED ACRES DEVELOPED: 12.3 ac

3:1 MITIGATION REQUIRED: 36.9 ac

ACRES RETAINED (in PPS): 18.4 ac

ADDITIONAL RETENTION NEEDED: 18.5 ac*


* (OFFSITE OR IN NON-PPS AREAS WITH OVER 30% SLOPES)

VEG RETENTION @ 60-40

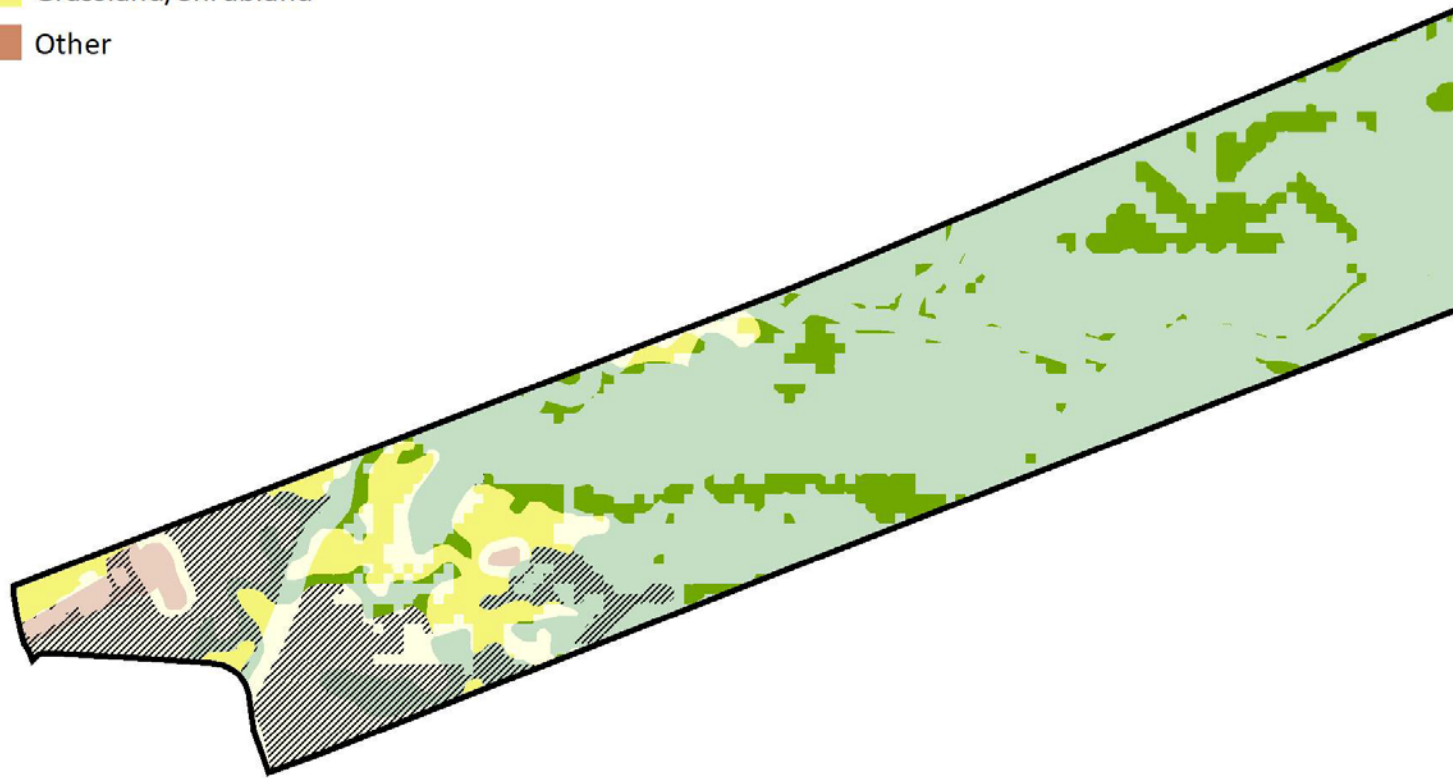
 **PPS Developed**

Landcover Category Preserved Within PPS

 Forested

 Grassland/Shrubland

 Other



TOTAL ACRES DEVELOPED: 29.6 ac

FORESTED ACRES DEVELOPED: 9.2 ac

3:1 MITIGATION REQUIRED: 27.6 ac

ACRES RETAINED (in PPS): 21.5 ac

ADDITIONAL RETENTION NEEDED: 6.1 ac*


* (OFFSITE OR IN NON-PPS AREAS WITH OVER 30% SLOPES)

VEG RETENTION @ 70-40

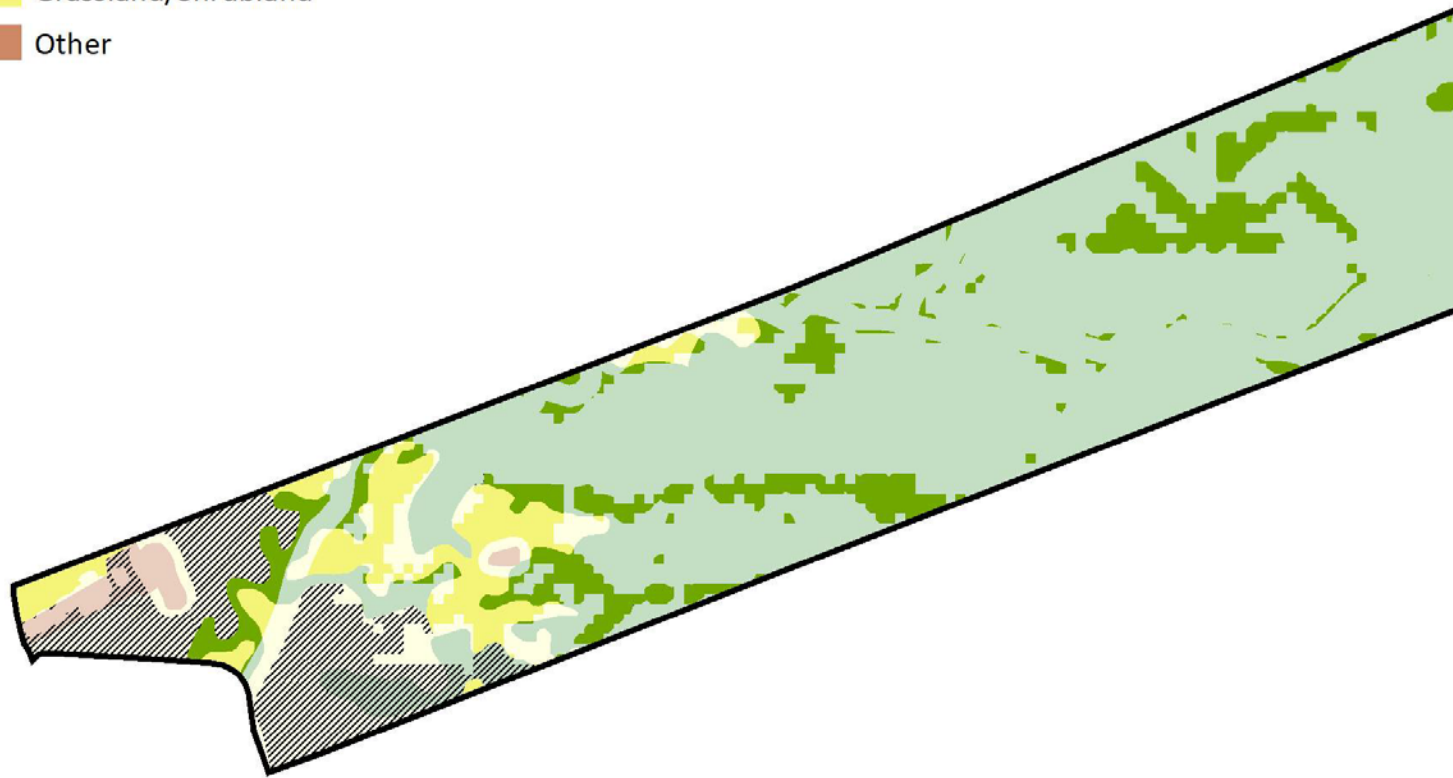
 **PPS Developed**

Landcover Category Preserved Within PPS

 Forested

 Grassland/Shrubland

 Other



TOTAL ACRES DEVELOPED:	25.0 ac
FORESTED ACRES DEVELOPED:	4.6 ac
3:1 MITIGATION REQUIRED:	13.8 ac
ACRES RETAINED (in PPS):	26.1 ac
ADDITIONAL RETENTION NEEDED:	0 ac

VEG RETENTION @ 85-40