



July 8, 2019

Napa County Planning, Building & Environmental Services Department  
1195 Third Street, Suite 210 Napa, CA 94559  
Re: Comments on 2<sup>nd</sup> Revised Climate Action Plan and Draft EIR.

Dear Director Morrison and Planner Hade,

Napa Vision 2050 appreciates the opportunity to submit comments on the 2<sup>nd</sup> Revised CAP and DEIR.

Current situation:

We are losing the earth as we know it. The pace of the loss is accelerating and we can feel its dangerous effects here at home. The CAP plugs along. If there is one key ingredient that is missing, it is the strength of climate leadership, animated by courage, selflessness, and love.

Bill McKibben, founder of 350.org, recently wrote that “winning slowly is the same as losing.” Eleven years have passed since the updated Napa County GP called for adopting a CAP. In the long two years since the revised CAP was proposed in 2017, awareness has grown that global warming is increasingly dire and time is running out.

We know that every day we delay, our children pay the cost. Half-way measures, such as the recently adopted tree protection ordinance, are no longer going to cut it. We have the know-how to forestall irreversible climate tipping points. What we lack is the ambition to do what is needed. That is why, over the last few of months, we have seen governments and schools around the world rapidly mobilizing to declare climate emergencies. Locally, each of the municipal governments and the County of Napa adopted their “County-wide Commitment to Address Climate Change.” Their proclamations refer to the October, 2018, IPCC report, “Global Warming of 1.5°C,” which states that “Limiting global warming to 1.5°C would require rapid, far-reaching and unprecedented changes in all aspects of society,” and projected that “the earth could reach and exceed this temperature threshold by as early as 2030, far earlier than previously anticipated.”

Napa students petitioned their schools to adopt a climate emergency declaration and, in May, the Napa Valley Unified School District adopted its “Call to Climate Change Action” resolution. In it, the District calls for leaders to “acknowledge that a climate emergency threatens the residents of Napa County,” and that they “respond with the necessary emergency measures.” It states that “policies should be guided by the best available science,” and supports local efforts “in order to achieve the goal of net zero climate pollution by or before 2030.”

## **2<sup>nd</sup> Revised CAP comments:**

1. Executive Summary (ES-5) states: “Local action on climate change cannot be addressed insularly by one agency or community, but requires active and ongoing partnerships between residents, businesses, the County, and other agencies and organizations in the region.”

Question: As part of the listing of steps taken by the County “over the last decade,” can the Executive Summary also acknowledge important recent work to bring local governments together to address climate change? Such an update would recognize the heightened awareness of the climate emergency, as local proclamations make clear in their calls for solutions at speed and scale beyond the CAP provisions. The County-wide Commitment to Address Climate Change proposes, for example, additional “actions focused on reducing radiative forcing levels associated with excess trapped heat.

The key partnership with the County’s youth, as primary beneficiaries of the CAP, should also be recognized in the Executive Summary. As children around the world have become aware, the climate emergency is the defining issue of our time. In their “Call to Climate Change Action” resolution, the NVUSD resolves to support “efforts to reduce the sources of excess trapped heat” in order to “achieve the goal of “net zero climate pollution by or before 2030.” *Napa County’s 2<sup>nd</sup> Revised CAP does not come close.* Thus, the “need for immediate climate emergency action at all levels of government” to ensure the added protection is achieved in time.

2. Executive Summary (ES-2) states “The County is focused on meeting the 2020 and 2030 targets, which are specific planning targets that will put the County on a long-term downward trajectory towards meeting the long-term 2050 goal.” However, as shown in Table 3-1, all but one of the eight GHG inventory sectors show zero (0) GHG reductions for 2020.

Question: Can the ES be updated to reflect the fact that, by the time it is adopted, the focus of the CAP will be on strategies to meet specifically 2030 GHG reduction goals, not 2020?

3. Monitoring mechanisms (ES-5) include provisions to review and update the GHG emissions periodically (every five years), track implementation, and report back to the Board of Supervisors and the public at least every two years. This is good. It would be better, at least initially, if a report could be made annually. The CAP, for all of its benefits, is inadequate, and additional countermeasures will need to be implemented ASAP to match the scale of the crisis.

Question: Can the County commit to annual progress reports?

4. Global Warming Potentials (GWP) used by CARB are those published in the ICPP's Fourth Assessment Report. The CAP should come into compliance with the specific language in the AB 32 GWP values definition: "based on the best available science, including from the Intergovernmental Panel on Climate Change." Note that the only place in GHG statutory law that the term "based on the best available science" appears is the key GWP definition, which is linked to the ICPP GWP definition. BAAQMD adheres to the GWP values mandated by AB 32. The use of GWPs from AR4 (2007) is antiquated. AR5 standards were finalized in 2014.

Question: Can the CAP be revised to reflect the 2014 AR5 GWP values?

5. Land use GHG reduction strategies refer to the newly adopted Ordinance 1438, the Water Quality and Tree Protection Ordinance. While a number of areas have been updated, references to canopy retention and mitigation in the CAP and appendices are not always consistent with provisions in the new ordinance.

Question: Can this be corrected?

6. Land Use Measure LU-1 establishes targets and enhanced programs for oak woodland and coniferous forest preservation and mandatory replanting. Starting in 2020, 2,500 "replacement" trees will be planted annually.

Questions:

- a. To what extent does the new tree protection ordinance reduce GHG emissions?
- b. Why, in this 2<sup>nd</sup> Revised CAP, are land use GHG reductions less than reported in the previous revision? (Incredibly, this comes after the tremendous community effort invested in Measure C and the tree protection ordinance.)
- c. What is the replant stocking rate in trees/acre? What if 20% mortality is exceeded?
- d. If, as we learned during the WQTPO hearings, 90% of mitigation for tree removal is "preservation" (as opposed to planting), where and how will the planting take place in order to achieve the annual goal of 2,500 trees planted in the county?
- e. Describe how "preservation" mitigates lost CO<sub>2</sub> sequestration when the forested area set aside for the task is already sequestering CO<sub>2</sub> optimally and, on steeper slopes, this same area is already off-limits to development.
- f. Given 2,500 trees/year planted and 20% mortality max, what is the lag time, in years, needed for replanted tree CO<sub>2</sub> sequestration to equal the amount of CO<sub>2</sub>e (direct and indirect) lost at the current rate of deforestation in Napa County?
- g. When land is cleared at the rates described in Appendix A, Table 14, is the current CO<sub>2</sub> sequestration rate losing or gaining? (In answering, please focus on the aspect of "current" CO<sub>2</sub> sequestration, since mitigation that regains lost sequestration decades later comes too late.) GP Element-65: the County will "strive to maintain and enhance the County's current level of carbon sequestration functions."

- h. Agricultural expansion projects that demand deforestation are unsustainable in today's climate changed world. Given the climate emergency, can the County encourage industry partners to adopt a forest safe wine certification that strengthens sustainability protocols and reduces negative climate impacts of deforestation?

7. Measure LU-3 requires repurposing of removed trees, prevents burning of waste.

Questions:

- a. If 80% of the biomass of killed trees is repurposed, and the trees and other woody material related to the land cover change is not burned, is burning of the remaining 20% allowed? Also, is repurposing of any of the waste biomass for fuel wood allowed? (That is to say, fuel wood for cooking or heating.)
  - b. What arrangements has the County made to repurpose oak and other non-commercial trees?
8. Open burning of waste agricultural biomass (AG-5). County will support BAAQMD efforts in finding alternatives to burning. Both combustion and decomposition produce super-pollutants to be avoided in local heat reduction efforts.

Question: Given the climate emergency, why not aim for 100% no-burn disposal of waste agricultural biomass, and minimal decomposition? Promote fusion gasification to produce bio-char to return to working lands. Pursue grants and legislation to make rapid gains at scale.

9. Many farming methods reduce the overall carbon binding capacity of the land. Carbon farming methods that promote a biodiverse microbiome build soil organic carbon. The CAP proposes to "Encourage and support the use of carbon farming and other sustainable agricultural practices" (AR-6) with a goal of engaging 10% of Napa County's working lands in carbon farming by 2030. Aim high, and pursue grant money and legislation to make it a reality.

Question: Given the climate emergency, why not accelerate conversion to 100% carbon farming by 2030? This would match the Napa Green ambition of 100% certification of eligible land and wineries by 2030.

10. Conversion to renewable diesel (AG-3, OR-2). The use of palm oil, a primary ingredient of renewable diesel, increases the potential for deforestation. According to some estimates, renewable diesel using containing palm oil can cause several times more CO2 emissions due to direct and indirect effects of land clearing. Lower impact alternative feedstocks exist.

Question: How can the County arrange for the use of certified, carbon-neutral, environmentally responsible renewable diesel, while traditional diesel vehicles are being converted to electric?

11. Reduction measure quantifications are shown in Attachment 1. As a practical matter of climate restoration, the County should focus on radiative forcing levels associated with excess trapped heat.

Question: Given the climate emergency, can the County steer resources toward the management and reduction of excess heat caused by short-lived climate pollutants, the focus of SB 1383?

### **DEIR comments:**

Select the Net Zero by 2030 Alternative as the environmentally superior alternative. To protect Napa residents, the agricultural economy, and the larger natural environment that sustains us and governs us, the CAP needs to be an emergency response to climate breakdown.

Not only could substantive deeper GHG reductions be achieved, but adopting this environmentally superior alternative would produce huge symbolic benefits. It would rally the community around the new carbon budget. It's a logical next step and entirely consistent with the County's bold proclamation last month, the County-wide Commitment to Address Climate Change, acknowledging that current actions will not be enough: "WHEREAS, on October 8, 2018, the IPCC released a report, "Global Warming of 1.5°C," which states that "Limiting global warming to 1.5°C would require rapid, far-reaching and unprecedented changes in all aspects of society," and projected that the earth could reach and exceed this temperature threshold by as early as 2030, far earlier than previously anticipated."

Moreover, the Net Zero by 2030 Alternative is consistent with the climate action demanded by our local school district. Climate change disproportionately impacts all young people and future generations. Napa students petitioned their schools to adopt a climate emergency declaration and, in May, the Napa Valley Unified School District adopted its "Call to Climate Change Action" resolution. The District calls for extraordinary, immediate emergency action: "WHEREAS, the global impact, urgency, and magnitude of the challenge of addressing climate change calls for courageous leadership in all sectors of society, in all institutions and from all elected leaders; and all those in positions of power must be held accountable. To preserve the health and longevity of the Earth for generations to come, leaders need to acknowledge that a climate emergency threatens the residents of Napa County and the entire world, and they must respond with the necessary emergency measures;" and "RESOLVED, that Napa Valley Unified School District Board of Education support local climate mobilization efforts to reduce the sources of excess trapped heat that are responsible for climate change, and to increase

resiliency for all residents, with special attention to the needs of marginalized and vulnerable communities, in order to achieve the goal of net zero climate pollution by or before 2030”

Consistent with the local County-wide Commitments to Address Climate Change, the County should adopt the Net Zero by 2030 Alternative, establish a community advisory group, such as a Regional Climate Stabilization Authority, and partner with municipalities, agencies and stakeholder groups. This Authority leads the Climate Emergency Mobilization of the entire community: 1. explore ways to accelerate the GHG reductions provided in the CAP with focus on immediate, meaningful, sustained and coordinated reduction efforts in all sectors of Napa County. 2. Mobilize other communities to align with the goal of net zero climate pollution by or before 2030. 3. Educate all staff on the latest climate science and the emergency mobilization needed in response. 4. Maximize current available funding and aggressively advocate for legislation to enable further climate stabilization measures needed at speed and scale to meet the “Net Zero by 2030” goal.

The hard truth is that the window of opportunity is rapidly closing. We cannot delay facing harmful practices that cause GHG emissions to increase at precisely the time we need them to plummet. Success depends on whether we can face climate reality with courage – all of us together.

The DEIR states that “this alternative would require the County to expand many of the current GHG reduction measures or include additional measures that would achieve further reductions such that ‘net zero’ would be achieved.” The Net Zero by 2030 Alternative describes the additional new and modified measures needed. “Overall, this alternative would result in less GHG impacts compared to the project.”

Napa County’s proclamation recognizes that it all needs to happen very fast and soon. The County’s proclamation, County-wide Commitment to Address Climate Change, justifies taking bold additional action: “WHEREAS, Climate modelling shows that it is not possible to stabilize global mean temperature rise at or below 1.5°C without undertaking additional pre-2030 climate mitigation and restoration actions focused on reducing radiative forcing levels associated with excess trapped heat. These urgent actions are additional and complementary to current efforts to reduce greenhouse gas emissions being undertaken by the state.”

Question: Given the climate emergency and local proclamations recognizing that unprecedented actions are needed that are additional and complimentary to current efforts, we cannot delay in implementing these protections. If the County does not select the Net Zero in 2030 Alternative as the environmentally superior alternative, explain the inconsistency.

Sincerely looking forward to working with you,  
Jim Wilson/ Napa Vision 2050  
Attachments (2)