

November 20, 2014

To: Kelli Cahill, Planner III

Napa County

Planning, Building, and Environmental Services Department

1195 Third Street, 2<sup>nd</sup> Floor

Napa, CA 94559

Re: WALT Ranch Draft Environmental Impact Report (DEIR)

Application No. P11-00205-ECP

Requested Action: Oppose. Deny Permit.

Dear Kelli Cahill,

Below please find our comments and questions regarding this DEIR. It fails to provide sufficient information for the adequate analysis of impacts, current and future, caused by this development. The DEIR also ignores reasonably foreseeable impacts by impermissibly limiting the scope of the project. These issues impacting human and environmental health must be addressed before the County of Napa takes action.

1. GHG. Anthropogenic climate disruption must be the basis of all planning. Yet Napa does not have a CAP. It is a member of the 9-county BAAQMD, which has a ten-point climate action plan calling for aggressive reductions in carbon pollution consistent with California AB32. Therefore, since the DEIR admits to the project's large carbon footprint, it is inconsistent with the direction all planning for future development must point to: Zero positive GHG emissions projects, and active, local reductions in absolute concentrations of GHG pollution.

Earlier this year the UN IPCC released their latest report using words such as “severe, widespread, and irreversible” to describe the effects of climate disruption. Scientists and engineers have done their job. Now it is up to government to respond.

The DEIR fails to fully evaluate the climate-forcing damage done by its carbon pollution. Understanding the cumulative impacts of climate-forcing GHG, how will Napa County protect its citizens – locally and globally – against increased carbon pollution caused by deforestation? How will Napa County protect future generations from the carbon pollution contemplated now, and in the future, in this DEIR?

2. Deforestation. The DEIR cites destruction of 28,616 trees 6 inches dbh. Understory and root mass is also planned for removal. The DEIR omits data regarding the organic mass removed and its carbon content. It fails to include impacts by removal of that carbon sequestering ability. It proposes to mitigate the deforestation by establishing a conservation easement of equal size and the planting of some trees.

Removal of ancient oak woodlands is, among other things, about removal of biological carbon and the services forests provide in reducing atmospheric carbon pollution. Deforestation for any reason is absolutely out of alignment with current climate reality. Napa County seeks to plan and control growth without a CAP, a guideline for REDUCTION in GHG. According to Carbon Tracker Initiative, if the earth is to have a chance of not exceeding global warming of 2 degC, it must leave (strand)  $\frac{3}{4}$  of known fossil fuel assets in the ground. Business-as-usual global carbon emissions are projected to use up our carbon budget, some 565gT, in the next 15 years! The importance of carbon sequestration by trees cannot be underestimated. This DEIR underestimates it.

How can Napa borrow from another county’s CAP provisions and apply them effectively to its own problems of climate protection? How will Napa County, endowed with beautiful hardwood forests performing critical environmental services for human and watershed health, justify their destruction? How, given the need to urgently reduce carbon pollution now, not at some future date, can Napa County justify deforestation in one location by not deforesting in other areas, or by planting seedlings which have a drastically reduced carbon sequestration potential for decades? If these next 15 years are the years during which we must apply the most vigorous climate planning to avoid compounding dangerously high atmospheric CO<sub>2</sub>, how does Napa County justify climate-wrecking deforestation, an action scientists see as immitigable in the time we have, and as risking irreversible impacts on human society and nature?

3. Erosion. Our family's property, the Mirabile Ranch, lies to the east of WALT Ranch. The properties are separated by approximately 1.3 miles of roadway, State Route 121. Water from the WALT Ranch drains through 16 culverts onto our property. Some of these streams empty directly into Capell Creek. Others drain onto fields which then shed the water via shallow channels into Capell Creek.

Anthropogenic climate disruption is upon us. For every 1 degC increase in average global warming, atmospheric moisture – vapor – increases 4%. This increase in water vapor, plus anticipated further increases, results in heavier rainfall events as the warming climate seeks equilibrium. The DEIR fails to identify and mitigate the impacts of increasingly extreme weather events due to climate disruption, including increases in the number and intensity of flash flooding events. The water balance and surface flows due to tree removal and resurfacing of areas of the watershed will add to risk of reduced rainwater percolation and increased surface water runoff.

How can Napa County guarantee there will not be an increase in rapid run-off onto our property due to tree removal and soil compaction in the watershed above us? If there is water incision of our fields and topsoil loss due to runoff, who is responsible now and in the future? What are the baseline field waterway dimensions against which future incision can be measured? If the Walt Ranch parcels are sold to a number of owners, each with small vineyard holdings in a given watershed negatively impacting our property due to run-off from those parcels, who is responsible? Who in the County assigns that responsibility? What guarantee do we have that the reservoirs planned for the project will be able to withstand a 100-year flood and does that event take into account the new normal of climate disrupted rainfall events?

4. Build-out of project. The DEIR ignores the reasonably foreseeable future build-out of WALT Ranch and its impacts by impermissibly limiting the scope of the project. Instead on one farming operation and one LLC as responsible, the DEIR should identify and mitigate the impacts of 35 owner/operators on 35 pieces of land, all with vineyard operations and all zoned for homes and wineries and marketing event centers.

A recent real estate development in Sonoma County points to this probable build-out. Hall Ranch, APN #131-040-021, located at 2457 Wilson Road, Geyserville, is owned by Hall T-T LLC of Frisco, TX. This Hall property is 424 acres with 83 acres planted to wine grapes on rolling and sloping terrain. It is being subdivided into ten estate lots of approximately 40 acres apiece, each with vineyard acreage. Each of the parcels has approved septic design and power and water.

Knowing this type of build-out is a real possibility for the Hall-backed WALT Ranch, will Napa County require a reappraisal of the project description and its impacts and mitigation? Given that water supply and demand for future homes and wineries and event centers are not specifically addressed, will Napa County do that analysis prior to considering approval? Does Napa County expect to assess power and septic service and commercial paved access for probable winery and marketing event centers on reasonably foreseeable future commercial developments on WALT Ranch? Can the County approve the DEIR without consideration of future impacts and mitigations of increased GHG pollution and water extraction resulting from wine production and tourism?

Thank you for your time and consideration.

Sincerely,

Leonore and Jim Wilson

5000 Monticello Road

Napa, CA 94558