



Stop Syar Exp
7-11-16 BOS
Quercus Group

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July 11, 2016

County of Napa Board of Supervisors
1195 Third Street, Suite 310
Napa, CA 94599-3092

Re: Syar Napa Quarry Expansion Appeal

Dear Members of the Board of Supervisors:

The Quercus Group appreciates the opportunity to submit Syar Napa quarry expansion project appeal comments. Our project remarks submitted on March 21, 2016 are incorporated by reference herein.

Leff Vineyard Conversion IS/MND Meeting

On December 13, 2010 a meeting regarding the Leff vineyard conversion project was held in Napa County. The main discussion point was forest land conversion GHG biogenic emissions. Attending on behalf of Napa County were Supervising Planner Bordona, Deputy County Counsel Anderson and then-Planning Director Gitelman. Dr. Leff's attorney Daniel H. O'Connell queried Director Gitelman regarding how confident she was that if the IS/MND adopted the County's argument and the project was approved, could the IS/MND withstand a potential legal challenge by Napa Sierra Club? He pressed as to whether Napa County was 100 percent confident? Director Gitelman responded "No" which was a tacit admission that the County's position of not fully accounting for both direct and indirect GHG biogenic emissions wasn't legally defensible. The Leff IS/MND #P09-00396-ECPA was approved by Napa County on March 22, 2011, with Quercus Group direct and indirect GHG biogenic emission estimations/mitigation measures unchanged.

Since 2010 applicable GHG policy and law regarding forest land conversion has only increased. The scientific case for and importance of forest land conversion indirect GHG biogenic emissions reduction/proportional mitigation has only grown more crucial. These circumstances beg the question: If Quercus Group is wrong today regarding the Syar Napa indirect GHG biogenic emissions omission, why does the Napa County approved Leff IS/MND exist? Perhaps Napa County can elucidate this planning dichotomy to the court.

Respectfully,

Ron Cowan, Principal

cc: Stop Syar Expansion