## Quackenbush, Alexandria

**From:** Christina Benz <christinabbenz@gmail.com>
**Sent:** Thursday, July 25, 2024 1:49 PM
**To:** MeetingClerk
**Cc:** Lynne Baker; Marilyn Knight-Mendelson; Linda Brown; Jim Wilson
**Subject:** Comments for Climate Action Committee meeting, July 26, Item 5B
**Attachments:** 240726 Comments to CAC.docx

**Follow Up Flag:** Flag for follow up
**Flag Status:** Flagged

**Categories:** CAC

[External Email - Use Caution]

Please put these comments on record and share with members of the Climate Action Committee and staff.
Thank you,
Chris Benz
Napa Climate NOW!
707-492-0089

July 25, 2024

To: The Directors and Staff of the Napa County Climate Action Committee

We are pleased to see that the GHG Reduction Measures Matrix includes actions that have been priorities for Napa Climate NOW!, including building reach codes, future bans on new and expanded gas stations, gasoline powered leaf blower bans, and a Reuseable Foodware Ordinance.

However, we are very concerned that the Regional Climate Action and Adaptation Plan (RCAAP) is not sufficiently specific to Napa County, contains errors, and leaves out opportunities. Our concerns include the following:

1. The climate pollutant, black carbon, is not included in the GHG Emissions Forecast Update. Actions to reduce black carbon emissions are not included in the GHG Reduction Measures Matrix. It seems that the additional requirement of the RFP to "include all climate pollutants such as black carbon…" was not adhered to.

This is particularly disturbing because the 2019 Short-Lived Climate Pollutant Inventory lists **black carbon emissions as 2,193,416 MTCO$_2$e – almost twice as much as the entire GHG emissions of 1,221,861 MTCO$_2$e** as reported in the 2019 Community GHG Inventory. (NOTE: Table 5, pg. 11 of the GHG Emissions Forecast has numbers that are very different, and much lower, that the 2019 SLCP Inventory—we are asking the RCAAP team to correct this.)

Furthermore, the 2019 Short-Lived Climate Pollutant Inventory attributes 98% of the black carbon emissions to wildfires. In other words, actions taken to prevent wildfires have a direct effect on reducing emissions in Napa County and should be included in the Reduction Measures Matrix.

Finally, as shared previously, and again during the RCAAP community meeting in Yountville, black carbon is up to 52,000-times more powerful than $CO_2$. This means that measures to reduce even relatively small amounts of anthropogenic sources of black carbon can make a big difference for our climate and shouldn't be dismissed.

2. The calculations of methane emissions from solid waste do not consider the local conditions at our landfills (flaring at the American Canyon landfill, and methane capture at Clover Flat) and current composting operations. Instead, the Emissions Forecast Update states "Solid waste is the third largest emissions sector and would increase with population…".

While ongoing efforts to increase composting and minimize organic wastes from being landfilled are crucial and should continue to be reinforced and strengthened, accurate emissions data are needed to assess the actual level of methane emissions from this source rather than relying on modeling assumptions so that we can properly baseline and measure progress. Such data are available.

3. As we have pointed out before, the Climate and Clean Air Coalition, a United Nations Environmental Programme convened initiative representing more than 80 countries, has identified tropospheric ozone (and ground-level ozone) as another important short-lived climate pollutant. (See https://www.ccacoalition.org/short-lived-climate-pollutants/tropospheric-ozone.)

Ozone is formed by volatile organic compounds (VOCs) and nitrogen oxides ($NO_X$) emitted largely by human activities, interacting with sunlight. It acts as a strong greenhouse gas, altering evaporation, cloud formation, and atmospheric circulation, and impacts crops and people's health. There are many sources of these precursor pollutants right here in Napa.

Yet this is not currently factored in at all to the GHG Emissions Forecast.

4. The RCAAP's adaptation strategies list, particularly as relates to reducing the urban heat island effect, could be further strengthened by adding in measures to explore and implement new construction and existing building renovation incentives to use higher reflective surfaces on roads, roofs, and buildings.

5. The RCAAP will be used to prioritize actions and direct finite financial resources. Given our collective goal of achieving net zero climate pollutants by 2030, it is vital that we prioritize actions that will have the biggest impact on reducing the excess trapped heat in the atmosphere that is driving climate change and come to terms with the short-term as well as longer-term implications of each climate pollutant. Depending solely on GWP-100 metrics, for instance, is a boilerplate approach that significantly undervalues the benefits of mitigating methane and very short-lived climate pollutants.

Moreover, the IPCC has warned that every year that goes by reduces our chances of avoiding a temperature overshoot, with cascading tipping point consequences. Our near-term actions are vital to draw down the heat as quickly as possible, to create a viable bridge to the future.

In summary, Napa County and our municipalities have a unique opportunity to provide leadership to other cities and counties in California and throughout the US. We urge you to take the time to thoroughly vet and discuss the Emissions Forecast, the Vulnerability Assessment, and the Reduction Measures Matrix. You may want to use an ad hoc Technical Advisory Committee of local experts in wildfire prevention, buildings, agriculture, natural lands, climate accounting, etc. to review the documents for their accuracy and usefulness to Napa County.

We are happy to support you in any way we can in the creation of the best plan possible.

Thank you,

The Napa Climate NOW! Steering Committee
Lynne Baker, Co-Chair
Marilyn Knight-Mendelson, Co-Chair
Chris Benz
Jim Wilson
Linda Brown

NAPA CLIMATE NOW!
A 350 Bay Area Group

## Quackenbush, Alexandria

**From:** David Graves <wavey1500@icloud.com>
**Sent:** Thursday, July 25, 2024 1:02 PM
**To:** MeetingClerk
**Subject:** Fwd: EPA's records and the American Canyon Landfill's GHG emissions

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I send this to the CAC in advance of tomorrow's meeting.
This analysis would seem to indicate that Ascent's GHG inventory for the solid waste sector as it relates to the closed American Canyon Sanitary Landfill is very much too large—by a factor on the order of 50 times. This comment includes references to actual EPA data and calculation methods.
David Graves
Sent from my iPhone

Begin forwarded message:

> **From:** David Graves <wavey1500@icloud.com>
> **Date:** July 10, 2024 at 3:59:36 PM PDT
> **To:** Ryan Melelendez <ryan.melendez@countyofnapa.org>, william.doran@countyofnapa.org
> **Subject: EPA's records and the American Canyon Landfill's GHG emissions**
>
> Good afternoon:
> I took advantage of the EPA"s Greenhouse Gas Reporting Program's help desk to dig into the reported value for of ghg emissions (in this case methane, of course) for the American Canyon Sanitary Landfill. This was their reply.
> I did as they suggested and looked at the GHGRP page for ACSL. Here is the link for that, but I share here the screen shot from the pager "Reported data" on the website.

## Methane Generation and Emissions values

| |
|---|
| Estimated Gas Collection Efficiency HH3 |
| Is Override Indicator? |
| Methane Generation Equation HH5 |
| Is Override Indicator? |
| Methane Emissions Equation HH6 |
| Is Override Indicator? |
| Methane Generation Equation HH7 |
| Is Override Indicator? |
| Basis for Input Methane Generation Value |
| Methane Emission from Equation HH8 |
| Is Override Indicator? |

## Gas Collection Systems details

| |
|---|
| Annual Volume FGCollected Gas Volumetric Flow |
| |
| |
| Annual Average Methane Concentration |
| |
| |
| |

On account of having an operating LFG gas collection and flaring system with appropriate record keeping and reporting, and using the value generated by Equation HH-8, the value of MTCO2e from ACSL would appear to be 65.92 metric tons methane times the accepted GWP value of 25, or 1,648 MTCO2e in 2022. I have not tried to calculate the First Order Decay value using past gas volume data, but that should be relatively simple.
My conclusion is that for this particular point source of methane, using the EPA calculation method, the hourly methane emissions are on the order of 7.5 kilograms.

As emissions from other sources decrease, even though the modeled value for ACSL emissions go down over time, the uncorrected value skews our view of the importance of this sector.

Dave Graves

Begin forwarded message:

**From:** noreply@ccdsupport.com
**Subject: e-GGRT Help Desk - Ticket -72357**
**Date:** Jul 10, 2024 at 7:07 AM
**To:** wavey1500@icloud.com

Thank you for your inquiry to EPA's Greenhouse Gas Reporting Program Help Desk.
For the facility in question, the detailed data is available when you click on the facility's icon in FLIGHT. This should bring you to the facility overview page which includes more information about the facility's emissions. In addition, on the bottom right hand side of the page is an option to open and view their detailed annual report- you can select any year (click "view reported data").

If you view the annual report, scroll down to the Subpart HH section, this is the section providing details on Municipal Solid Waste emissions. As you mention the facility does have an LFG collection system in place. This is accounted for in the reported emissions data.

There are several equations in Subpart HH that account for emissions including LFG and oxidation. Essentially equation HH-1 models the emissions generated based on historical waste, HH-4 estimates LFG collection and equations HH-6 and 8 adjust the modeled values for LFG and oxidation. The emissions value used for this facility appears to be based on HH-6 (1,346 tons of methane x 25 to get CO2e). This is the higher of the two estimates from equations 6 and 8. If the result for equation HH8 is more appropriate for your inventory modeling you may consider that- in EPA's case the higher value is automatically used unless the facility choses the lower one.

For more detailed information on the underlying equations and rule, please visit:
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-98/subpart-HH

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If you have questions about this ticket, you may contact us at GHGReporting@epa.gov. Make sure you reference the ticket number shown in the subject line.

Please do not submit sensitive or confidential business information to the Help Desk. Anything you send to this address may be made available to the public.

For a copy of the final rule and related resources please visit EPA's Web site at: http://www.epa.gov/ghgreporting

Thank you,
Greenhouse Gas Reporting Program Help Desk

The Greenhouse Gas Reporting Program (GHGRP) Help Desk is intended to provide general assistance with EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT) and other rule-related questions. The GHGRP Help Desk does not provide legal advice, and responses to questions received through this help desk do not have legally binding effect or expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits in regard to any person. Facility owners or operators and suppliers are responsible for determining how they would be affected by the requirements of the rule. Although EPA will do everything possible to respond in a timely manner, it is the reporter's responsibility to meet all applicable deadlines, and any action or inaction by EPA does not in any way affect that obligation.

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Napa County and its cities are drafting a climate action plan; in order to accomplish that, our consultant Ascent Environmental has created a comprehensive GHG emissions inventory for all sectors, one of which is Solid Waste. in 1995, our American Canyon Sanitary Landfill closed and it is enrolled in the GHGRP, registration 1004465. When capped after closure, the landfill gas collection system operated under a BAAQMD Title V permit. As the quantity of landfill gas produced decreased, the operator applied to operate a collection and flaring system under a Synthetic Minor Operating Permit; that request was approved in 2011. In the application for the latter (BAAQMD Application # 18923), there is a discussion of the "Potential to Emit" value in 2009 with the collection and flaring system in place.How does one reconcile that low value with the 2019 GHGRP reported value of 38k+ MTCO2e? That value would seem to be the output of the EPA model as if there were no collection and flaring system in place. I have looked at the EPA Flight data for this site and am confused as to what the "real" GHG emissions value should be.

**Quackenbush, Alexandria**

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**From:** Lori Stelling <lori.stelling@me.com>
**Sent:** Thursday, July 25, 2024 9:33 PM
**To:** MeetingClerk
**Subject:** COMMENT FOR JULY 26 CAC MEETING RE: RCAAP PURPOSE

[External Email - Use Caution]

Dear CAC Members,

As a parent who has been actively engaged in local climate advocacy since 2016, I wanted to be sure to reach out this evening to let you know that I still strongly support the purpose of the RCAAP as amended back on September 27, 2023:

"The purpose of the RCAAP is to prepare a comprehensive plan for the Cities of American Canyon, Calistoga, Napa, and St. Helena, the Town of Yountville and the County of Napa to achieve the goal of carbon neutrality (net zero greenhouse gas (GHG) emissions) by the year 2030."

This week I've learned that the Copernicus Climate Change Service has reported that the past 13 months have been the warmest on record (https://climate.copernicus.eu/copernicus-june-2024-marks-12th-month-global-temperature-reaching-15degc-above-pre-industrial). As I shared back in 2023, our youth continue to need the adult leaders of their communities to ensure that we move far more diligently and swiftly on healing this crisis. Please do all you can to ensure that delay after delay and 'business as usual' are no longer an option. Make the goals of our RCAAP robust, meeting the sense of urgency that is demanded now.

I look forward to participating in the online RCAAP meeting on the 30th. Thank you for the opportunity to participate and for all actions you will take towards creating a strong RCAAP.

Sincerely,
Lori Stelling
Napa Resident 25+ years