Comments addressing the Final EIR-----Walt Ranch Vineyard Conversion

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Response to Comment O9-18 FEIR Volume 1

"… The estimated water demand for the Walt Ranch Project is consistent with the Water Availability Analysis (WAA) – Guidance Document approved by the County on May 12, 2015.Appendix B to the WAA provides estimated water demand for various land uses… The estimated water demand also assumes 0.25 af per acre per year for frost protection…"

Please note that the WWA does not address the number of vines per acre, which of course will affect the amount of water used---more vines = more water demand.

The WAA further states:

"…The estimated water use for each project will vary depending on existing parcel conditions.

Guidelines for Estimating Non-Residential Water Usage:

Agricultural: Vineyards

Irrigation Only 0.2 to 0.5 acre-feet per acre per year

Heat Protection 0.25 acre-feet per acre per year

Frost Protection 0.25 acre-feet per acre per year…"

As stated by the WAA these figures are "estimated guidelines", they do not address the number of vines per acre which can vary from 1000 vines per acre to as many as 6000 vines per acre. The "estimated guidelines" also do not address other variables such as micro climate, soil type, wind, variables such as dryness –heat—morning and evening fog, and others. In this application it is of paramount importance to know what the "actual" water use will, considering the shared aquafer with the community of Circle Oaks. Without the actual data all the vineyard water use numbers have no "real world" meaning.

There is an objective third party study of vineyard development costs created by "University of California Cooperative Extension" 2012 Titled:

"Sample Costs to Establish a Vineyard and Produce Winegrapes North Coast Region Napa County" by UC Cooperative Extension Farm Advisor, Napa County

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(a copy of this report is attached at the end of this comment letter and is available at

http://coststudyfiles.ucdavis.edu/uploads/cs_public/23/26/2326336b-eb3e-4cda-a0f4-cca46e84429b/winegrapenc2012.pdf)

Page 3 states that the study uses the figure "… 1,555 vines per acre…".

And on page 5 "…one irrigation per week are applied over a 20-week period

(155,865 gallons per acre or 5.74 acre inches)…" Note: 6.0 acre inches is 0.5 acre foot

The DEIR and FEIR both state that the Walt Ranch vineyards water use the figure of 0.5 acre foot of water for 2,420 vines.

In summary UC Davis--- 5.74 acre inches for 1550 vines, and FEIR --- 6.0 acre inches for 2,420 vines.

The math works out to be that if we assume that UC Davis study is accurate, then the DEIR and FEIR vineyard water use baseline **would require 70% more water per acre** then stated in these EIRs**.** Therefore the DEIR and FEIR are flawed and should be corrected because it is based on an incorrect assumption. This could result in an incorrect decision for this project.

Will the County of Napa require the correct figures in the FEIR?

Will the County endeavor to establish what the actual water use will be by soils testing and limit numbers of vines and type in order to get accurate figures?

The UC Davis study also notes; 0.25 acre foot water use for vineyard cooling, why was this figure not included and considered? Will this be considered in the final decision?

There are 189 homes in the Circle Oaks Water District; their water source needs to be protected.

It should be noted that Circle Oaks Water District has 189 water hookups, not the 150 as stated in the EIRs and that Circle Oaks is not built out and must be able to provide for future homes.