

April 3, 2016

Brian Bordona, Supervising Planner
Napa County Planning, Building & Environmental Services Dept
1195 Third Street, 2nd Floor
Napa, CA 94558

Re: Walt Ranch Vineyards Agricultural Erosion Control Plan #P11-00205-ECPA

Dear Mr. Bordona,

I have new concerns regarding the above named Walt Ranch Project. I believe these issues need to be considered in the decision process of whether or not to approve this development as stated in the Final EIR.

Hall Brambletree is choosing not to operate the vineyards using organic methods, but will manage the proposed vineyard using IPM techniques (vol. 1, 4-229). Why is Hall Brambletree being allowed to use any pesticides in the Milliken Capell Watershed? The City of Napa Water Division, which services 80,000+ customers, has voiced their opposition to this, yet the County feels it is ok to contaminate the watershed? The County says there are no significant impacts on water quality because pesticide use is highly regulated (vol. 1, page 4-45). Nothing can be guaranteed. Will the County pay for the filtration system that may be needed if Milliken Reservoir is contaminated with runoff and pesticides? The Napa water customers should not be made to pay for the County's error.

It has been calculated that there will be 22 miles of wildlife exclusion fencing on the Capell side of Walt Ranch and 9 miles of wildlife exclusion fencing on the Milliken side. As stated in the Final EIR, this is a less than significant impact to wildlife movement (page 4-14). What does it take to constitute a significant impact? I find it hard to believe that wildlife will not be eviscerated with this much fencing. Who is going to monitor the wildlife and be sure it isn't impacted with all this fencing?

I believe there is a gross miscalculation of the water usage in the Final EIR. As stated in Vol 1 Sec 4.6.1-4 (page 4.6-17), "For vineyard irrigation, approximately 173.5 af would be used (maximum of 347 acres of planted vineyard irrigated at a rate of 68 gallons per vine per year and 2420 vines per acre)". According to a 2012 University of Calif. Cooperative Extension report for Napa County, vines are planted at 1555 per acre, not 2420 per acre. And the report says 5 gallons per week per vine over a 20-week period, so that equates to 100 gallons at minimum, 260 gallons for a full year. How does Walt Ranch use only 68 gallons per vine per year when 2420 vines is already 56% over the recommended planting per acre? And the UC report states that "no assumption is made about effective rainfall." What if there is little rainfall to recharge the aquifer because this drought continues? This discrepancy needs to be addressed.

In response 4 of the Final EIR Vol.1 (page 4-4), it says that the proposed water supply is designed to provide water needs for the property development of vineyards; it's not designed to serve another purpose. But in Vol 2, 4.6.1-4 (page 4.6-17), it states that there are two reservoirs "not proposed to provide water supply for the Proposed Project; rather, those reservoirs are proposed for recreational and fire control purposes unrelated to the Proposed Project." If the applicant states the purpose of the Proposed Project is develop vineyards, then why does it need a recreational reservoir? Several commenters expressed concern about future developments like Hall Ranch (developed by Hall Financial) in Geyserville which has a very similar blueprint to Walt Ranch, but the County did not answer their questions. Will the County specifically prevent the splitting of Walt Ranch into estates if that is the end goal of Hall Brambletree? Once the County allows Walt Ranch to move forward, will Hall Brambletree be required to file an EIR again if they want to sell off each parcel as an estate? Or does it mean that once they are allowed to develop Walt Ranch as vineyards, later on they can do as they wish to the property without any restrictions? Will the impact on the neighbors and the environment carry any weight? Will the County even answer these questions?

Everyone was pinning their hopes on El Nino to relieve California of its drought situation, but it didn't live up to expectations. The storm track hit farther north in Washington, Oregon and northern California. For the drought to be over, the

snowpack needed to be at least 150% of normal by April 1, but statewide it's at 87%. Experts warn that a long-term trend of drier weather may return this year and we'll continue to have drought for several years to come. How does Napa County justify allowing a massive vineyard development that will use between 60.9 million gallons per year during the drought? According to the protestant's experts, the water usage is more accurately three to five times that amount per year. Circle Oaks uses 12-15 million gallons per year and that is water for lives, not grapes. Because of climate change, there is no longer an average rainfall year to count on to replenish the aquifer. Drought is very possibly the new normal.

Water is life itself and needs to be protected at all costs. With the valley floor completely developed, new vineyard expansions are moving into the hillsides and watersheds. Napa County needs to be the steward of the land and protect the well being of its residents who are just as important as businesses. Today is the time for the Planning Department to make the difficult decisions that can one day be looked upon as the turning point that preserved Napa Valley for future generations.

Please reconsider your decision to allow the Walt Ranch development to proceed as it is stated in the Final EIR. It needs to be scaled back still or denied altogether.

Sincerely,

Laurence Carr
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