

4/3/2016

Mark Billings

16 Rockrose Court

Napa, Ca 94558

Napa County Planning, Building, & Environmental Services Department

1195 Third Street, 2nd Floor, Napa, CA 94559

Update to my Comment Letter " I111" dated 11/21/2014:

I would like to re-submit my original letter because the most important concern was not addressed concerning the safety of Circle Oaks Drive (See I111-2). The second line third paragraph states, "...There are several deep longitudinal cracks that would indicate that the subgrade has subsided and is on the verge of failing. ...further damage to the subgrade would most likely result in a total structural failure and loss of the road. ...". New longitudinal cracks opened in this area (evidence of subsidence) during the March rainfall this year, the same time as the road failure on Hwy 121 2 miles South of Circle Oaks.

The Final EIR response did not address road failure. It did address infrastructure damage, but not road failure. It also did not address the environmental damage if the sewer was compromised and raw sewage entered Capel Creek watershed.

Best Practices requires that the County contract with an Independent geotechnical engineer, to be funded by the applicant. The engineering firm selected should at a minimum conduct a survey of the road, perform soils testing to determine the condition to the road section and underlying subgrade materials and provide recommendations as to weight limits not to exceed.

There is a reasonable alternative that would avoid any damage to the county-maintained roads and minimize the damage to local residents and the environment. **The access to this project should come off of Highway 121.** The applicant should bear the responsibility for proving why this is not a superior and preferred alternative in light of the preponderance of evidence that predicts increased damage that will threaten the safety and economy for local residents and eliminate the environment impacts from damage to the roads.



Mark Billings; Certified Public Infrastructure Inspector, CPII

Mark Billings
16 Rockrose Court
Napa, Ca 94558

April 3, 2016

Mr. David Morrison
Napa County Planning, Building, & Environmental Services Department
1195 Third Street, 2nd Floor
Napa, CA 94559

RE: Updat to my Comment Letter " I111" dated 11/21/2014

Dear Mr. Morrison:

I would like to re-submit my original letter because the most important concern was not addressed concerning the safety of Circle Oaks Drive (See I111-2). The second line third paragraph states, "...There are several deep longitudinal cracks that would indicate that the subgrade has subsided and is on the verge of failing. ...further damage to the subgrade would most likely result in a total structural failure and loss of the road. ...". New longitudinal cracks opened in this area (evidence of subsidence) during the March rainfall this year, the same time as the road failure on Hwy 121 2 miles South of Circle Oaks.

The Final EIR response did not address road failure. It did address infrastructure damage, but not road failure. It also did not address the environmental damage if the sewer was compromised and raw sewage entered Capel Creek watershed.

Best Practices requires that the County contract with an Independent geotechnical engineer, to be funded by the applicant. The engineering firm selected should at a minimum conduct a survey of the road, perform soils testing to determine the condition to the road section and underlying subgrade materials and provide recommendations as to weight limits not to exceed.

There is a feasible alternative that would avoid damage to the county-maintained roads from construction and operational usage, minimize the damage to local residents and the environment and meet the project objectives. **The access to this project should come off of Highway 121.** The applicant should bear the responsibility for proving why this is not a superior and feasible alternative in light of the preponderance of evidence that predicts increased use will damage the road and will threaten the safety and economy for local residents.

Circle Oaks Drive is the only proposed access to this project and will be subject to transport of heavy construction equipment during a four-year construction period and continued use for transport of annual grape harvests. This road is in a state of failure and access from Highway 121 is the only alternative that makes sense for this project.

Yours truly,

Mark Billings
Certified Public Infrastructure Inspector: CFII