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**Re: Walt Ranch Development Project Final EIR**

Dear Mr. Bordona,

Thank you for the opportunity to comment on the Final EIR (FEIR) prepared for the Walt Ranch Development Project proposed by the Walt-Brambletree Corporation.

As you know, the deficiencies of the DEIR's review of the Project's environmental impacts prompted an outpouring of critiques, buttressed by the expert testimony of numerous experts and by contributions from well-informed residents of Circle Oaks and the larger Napa County community.

Unfortunately, the FEIR fails miserably to address these concerns. The end result is a product that is woefully inadequate and I urge the County to require the FEIR be revised.

From my perspective as a homeowner, the most outstanding inadequacy is the failure to consider alternative access to the Project., which would help to mitigate a number of impacts. There is a 1000 foot length of essentially straight roadway along highway 121 about 2 miles north of Circle Oaks Drive. An existing road on the Project in fact parallels this segment of highway for the entire distance. The existing road is about 30 feet from the highway, allowing a safe turn-in to be constructed without substantial modification. A minimum of trees would need cutting to accomplish this. A midpoint entry would allow 500 feet of sight line in both directions along Hwy 121. This length of sight line would be GREATER than what is

available as a driver approaches Circle Oaks Dr from the south. It presents a SAFER traffic alternative to a Circle Oaks entry to the Project.

This alternative has other advantages. It is 2 miles CLOSER to the CDF fire station, significantly improving response time in the event of fire on Project land; and, therefore, reducing the risk for spread to the 500+ residents of Circle Oaks.

Secondly, residents would be able to exit in an emergency with much less potential for interference with fire trucks responding to the emergency. Circle Oaks Drive is the route out of the community for roughly half of the residences. In fact, both of the only two egress routes in our community require Circle Oaks Dr to be passable and unimpeded in order for autos to exit the development in an emergency.

The FEIR is inadequate in its response to safety and stability questions about the proposed access point. Circle Oaks Drive is a residential road fitting the description of a “General Minor” road in the Napa County Road & Street Standards, 2016 revision (page 13) . With a grade of 18 percent and a sight-line on the s-curve of only 95 feet, it fails to meet two major design criteria: “maximum grade” and “minimum sight stopping distance”(page 19). A couple of basic questions arise that need to be addressed were the County to support this folly: 1) What is the stopping distances for construction vehicles and grape hauling trucks fully laden going down an 18% grade when the weight , braking, and driver reaction times are considered; and 2) How does this distance compare to a 95 foot sight line of pedestrians using the edge of the street where there is neither a sidewalk nor a proper shoulder?

I have attached a picture of the S-curve, which not only shows the nature of the somewhat blind curve, but also road damage that appeared with a recent 10 day period of heavy rain that totaled 13 inches.



A second picture shows what a pedestrian would look like to a truck driver going down the slope 95 feet from the individual, the distance at which a pedestrian would first appear to a careful driver whose eyes were fixed on the road ahead. It is important to acknowledge that drivers of grape harvest vehicles are paid NOT BY THE HOUR, but by the weight and number of trips. No reasonable person should expect that a suggested 15 mph speed will be observed.



The lack of stability of roads in Circle Oaks under light residential traffic has already been demonstrated by expensive and frequent road failures. (Relevant pictures and data have been provided by other commentators). Heavier use by heavier vehicles will make for more frequent and more expensive damage. The best and most reasonable and cost-effective mitigation for this is an alternate route! None of this has been weighed or addressed in the FEIR.

I have attached a graphic I created of the March 2016 road failure on Hwy 121 located 1 ½ miles south of Circle Oaks. The big question is what role the vineyard located 400 yards from the road loss contributed to this multi-million dollar repair project. The washout occurred because of an accumulation of water on the western (vineyard) side of the road (NOT from the creek below UNDERcutting the road, as has occurred in the past). There is a swale that begins far above, and deposited the water right at the location of the road failure. The vineyard above that undoubtedly contributes water to this flow is planted in a downhill direction that appears to intensify water runoff. Where is the directionality of vineyard planting discussed in the Walt Ranch FEIR? This is the very risk faced by the Circle Oaks community, with similar slope and similar soil.



Finally, I will comment on one final neglected issue: earthquake risk.

We in Circle Oaks are grateful that the recent Napa earthquake largely spared our community, although the land movement caused \$13,000

damage to the water district infrastructure, primarily to pipes. We know we will not be either grateful nor lucky when the much closer Green Valley fault moves. The ridge on the Walt Ranch property largely parallels the fault line in this area, according to USGS maps available online. There have been three recent significant earthquakes on this portion alone of the Green Valley fault if you include the continued segment toward Atlas Peak. This is the definition of an active fault. USGS has recently upgraded their estimate of the maximum credible earthquake on the Green Valley Fault from 6.7 to 7.1 magnitude. I live one thousand feet from this fault, a not-uncommon distance for Circle Oaks residence. A quake of magnitude 7.1 would pack the energy of more than 10 times the Napa earthquake. I can retrofit my house but I cannot retrofit the land that would come down and swamp our community if it is disturbed the way this project envisions. The mechanism would be the placement of addition layers of shale overlying the clay that we know underlies the land on this debris-flow-on-the-slide-of-a-mountain. Where is an analysis of the possibility of such a catastrophic failure were a series of rainstorms to precede an earthquake. Where has the analysis of siting two large reservoirs on such a landscape been discussed? What about the sloshing out of large amounts of water from a reservoir onto surrounding terrain with earth movements? What path would the water take? What are the predictable erosion effects? Could this risk be mitigated by appropriate siting decisions? The comment record for this Project includes a photograph of the infamous slide of 2006 that closed Hwy 121. The soil and geology there is the same as on the Hall-Brambletree property above Circle Oaks.

Thank you for your hoped-for attention to these concerns.