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Living Rivers Council
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Earth Defense for the Environment Now
EDEN

Mission Statement

The Living Rivers Council and Earth Defense for the Environment Now were established to protect, restore, defend and preserve watersheds in natural harmony with the people and wildlife that depend on healthy water for economic vitality, recreational enjoyment and ecological sustainability. We will pursue these goals through education, research, consensus building, and advocacy.

April 4, 2016

Napa County Planning Building and environmental Services, (PBES)

Director

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Regarding: FEIR #201202046; ECPA #P11-00205 Walt Ranch Project; west side of Monticello Rd. one mile southwest of intersection with Highway 128; within the Milliken and Cappell Creek-Upper Reach Drainage

Living Rivers Council is concerned about significant cumulative impacts occurring in the Napa River watershed, not adequately discussed in the Walt FEIR:

1.) The Milliken Sarco Tulocay, MST aquifer, has been in decline for decades. PBES, fails to adequately inform the public of this decline. Last year on Atlas Peak Rd. 6 wells went dry requiring costly new deeper wells to be drilled. Throughout the MST other wells are going dry causing neighborhood alarm and concern. a.) how many wells going dry in the MST is the County aware of? b.) what is the safe yield and does the County require a water budget for all new projects?

A hydrologist working for the Institute for Conservation Advocacy, Research and Education, ICARE, recently made this statement regarding the USGS/DWR MST 1977 vs the 2003 reports on the MST aquifer status.

'The unit descriptions in the 1977 and 2003 reports.... but both reports use the same symbols and mapped areas. What is important is that the cross-sections clearly show the sedimentary volcanic and 'unwelded' tuff are basin filling units and not volcanic flows.the ash fall tuff is the main water bearing unit and that water levels within it may still be declining or are flat and have not recovered in a few decades.....'

LRC is concerned that accurate information is not being used to determine the cumulative impacts of groundwater pumping impacts in the MST. Residential wells are competing with the major land use extractors, vineyards, having to drill deeper and deeper to reach aquifer surface levels.

As the groundwater diminishes it depletes surface water and critical habitat for threatened species such as steelhead, which migrate, spawn and rear in the MST streams. This is an 'undersirable outcome' of aquifer depletion. Year after year these streams are depleted due to direct surface water diversions combined with groundwater extraction which are pushing steelhead into extrication in the Napa River watershed.

Groundwater depletion exceeding 10 years in sedimentary aquifers with 'undersirable outcomes' qualifies the MST for groundwater management according to the Sustainable Groundwater Management Act passed by the State Legislature in 2014. PBES chooses to ignore this significant cumulative impact.

2.) Significant cumulative erosion from this ECPA in combination with another 700+ acres of existing vineyard ECPAs have not been discussed as cumulative impacts in the Milliken watershed. This on-going erosion continues to impair the Napa River that was listed for sediment, nutrient and pathogen impairment since 1988. While ECPAs far exceed back ground natural erosion off undisturbed lands, additionally they continue to erode for the life of the vineyard.

3.) Deforestation of over 700+ acres of native trees, in the MST watershed, has not been discussed or mitigated. Napa must be responsible for global climate change. Deforestation for a luxury beverage industry is not responsible. Napa County trees must help sequester carbon to mitigate for green house gases.

Deforestation/devegetation of 30,000 trees in just the Walt Ranch parcels in combination with deep ripping and grading of soils for the installation of ECP infrastructure causes severe downstream erosion to streams and the Napa River due to increased rate of runoff. Erosion causes the destruction of spawning gravels for salmon and other aquatic resources.

4.) The Milliken municipal water supply Dam is governed by the Division of Dams and Safety who carefully monitors and visually inspects the Dam due to its decline in stability caused by fractures in the face of the dam. The City of Napa, who manages this City's water supply and dam facilities, had to bore several large holes across the face of the dam to keep the water surface elevation 15 feet below the surface elevation of the dam to reduce the stress pushing against the face of the dam should an earthquake occur. This reduces the amount of water that can legally be held in Milliken reservoir. This in combination with erosion from hill-side vineyards flowing into the reservoir and depositing within the reservoir, reduces the amount of storage capacity of Milliken Reservoir. Additionally, this sediment deposition puts further stress on the failing dam itself.

Increased sedimentation caused by significant cumulative impacts from all vineyard developments in the Milliken watershed is causing the water quality to decline due to sediment carrying contaminants. The City rate payers will have to pay for a 20 million dollar rate increase for the upgrade of Milliken water treatment plant should the Walt Ranch development proceed.

The County in collaboration with the City of Napa must study these impacts to not only protect future water supplies for the City, but the safety of down stream residents who will be in harms way should the dam fail due to cumulative sediment deposition impacts from land conversion to vines. The Division of Dams and Safety should be in consultation with the County over this impact and carefully gauge the impact to water quality and safety to the public.

6.) Deforestation plus deep ripping and grading of soils causes fine particles of erosion whereby suspended sediment in the streams and river never settles to the bottom of the creek or the reservoir. This remains in suspension causing turbidity that further diminishes the useable water in Milliken municipal Reservoir, the streams and Napa River. Additionally, this increased turbidity in very small parts per million, causes salmonid redds mortality.