

October 15, 2014

Mark Luce, 2014 Chairman
Napa County Board of Supervisors
County Administration Building
1195 Third Street, Suite 310
Napa, CA 94559

Re: Appeal of the November 6, 2013 Decision by the Napa County Planning Commission on the Woolls Ranch Winery Use Permit No. P13-00187
Hearing Scheduled for October 21, 2014

Dear Chairman Luce and Board of Supervisors:

The water sustainability of the current vineyard operations and proposed Winery Use Permit No. P13-00187 on this single parcel is in question and the Board of Supervisors should deny the permit and require the current operations and proposal to be scaled back to a sustainable size that is within the available property assets.

WATER QUALITY

Of the three wells on the property, only 2 are currently potable and usable for human consumption and grape irrigation.

The Pond Well - (also known as #1-'09 by Huckfeldt the well driller) water is not potable and detrimental to Grape Growing and Winery production. A mineral testing of the well water was conducted during the drilling operation on 11/9/2007 showing high levels of Boron (2.7 mg/L), Sodium (salt 320 mg/L) and Arsenic (0.008 mg/L) see figure #1.

The Pond Well was retested for mineral content on 4/24/2014 by Luhddorff & Scalmanini (L&S), consulting engineers, during a phase II Water Availability Analysis (WAA) required by Napa County Board of Supervisors. This analysis showed high levels of Boron (1.9mg/L), Sodium (310 mg/L) and Arsenic (0.049 mg/L).

The high limit of Boron sensitivity for Grape irrigation is 0.75 mg/L, so the Pond Well upon drilling was 360 % of the high sensitivity limit. Upon L&S testing, the Boron concentration dropped to 250% of the high sensitivity limit and remains unusable for Grape irrigation. This water source should not be considered Available Water for the Parcel Irrigation of Grapes.

The high limit of Arsenic sensitivity for Human Consumption is 0.01 mg/L, so the Pond Well upon drilling was 80% of the sensitive limit. Upon L&S testing, the Arsenic concentration increased to 490% of the sensitive limit, and is now unsuitable for Human Consumption. Not to mention that the grape vines translocate the arsenic into the berries (grapes) and later absorbed into the yeast cell membrane during fermentation. This water source should not be considered Available Water for Human Consumption and Parcel Irrigation of Grapes.

The Woolls/Walker Well - (#1-'09 by Huckfeldt) and the Winery Well (#1-'07 by Huckfeldt) produced potable water fine for Grape Growing and Winery Production. I am unaware of any mineral testing of these wells conducted during drilling operations.

A disturbing note is the early detection of the Boron and Arsenic during the drilling operation and the lack of a danger recognition by all parties having access to the early mineral testing. The figure #1 document was found in the Environmental Health file for the Woolls Parcel amongst the drilling records and permits.

WATER RECHARGE

The Phase II Water Available Analysis by L&S ignores an important point about the water recharge calculations. If the water from the Pond Well is so contaminated to be Unavailable for Winery and Vineyard Operation, then the recharge for this well should be excluded from Water Source calculations in 8.1, Groundwater Supply, and 8.2 Water Sufficiency of the Report.

Even if some of the Pond Well Water is diluted (mixed) with water from the two Potable Wells, Winery Well and Woolls/Walker Well, the recharge calculations must also reflect those changes. If the Pond Water Requires a 65% dilution from the Woolls/Walker well and/or the Winery Well, this would leave only 3.15 to 3.5 Acre-Feet of Pond Well Water available for Vineyard Irrigation, not 8.2 or 9.13 Acre-Feet. This would be a substantial reduction in the recharge calculations, with the subsequent recharge rate falling short of the annual groundwater extraction required during normal and especially dry years.

HAULING WATER

From 7/10/13 to 9/30/13 at the height of the 2013 growing season, the Woolls purchased and hauled 1,748,000 gallons of potable water from the Napa City Water Department. Woolls has indicated in the WAA that the water hauling was required by maintenance of the three wells or regard for neighbors water sources. We do not ascribe to this reasoning, for if the Woolls missed or ignored the early drilling mineral analysis of the Pond well, then their only recourse was to flush the accumulated Boron out of the soil root zone using water from the 2 potable Wells and/or Hauled water from Napa City to supplement the well water.

CONCLUSION

The Woolls records with water sourcing, mineral detection and irrigation procedures shows good cause for a Fair Question of the Mitigated Negative Declaration of the Erosion Control Plan P08-00436-ECPA adopted May 27, 2009 for the construction of the vineyard.

As you can see, monitoring of the water quantity and quality cannot be a one or two time event over the life of the vineyard, it must be continuous on a monthly basis for quantity and yearly for quality.

The current Woolls Ranch Winery Use Permit must be denied or revised to remain sustainable within the property assets on the parcel.

Gary Margadant
President, Mt. Veeder Stewardship Council
4042 Mount Veeder Road
Napa CA 94558