



CITY of NAPA

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November 21, 2014

Ms. Kelli Cahill
County of Napa
Planning, Building and Env'tl Services Department
1195 Third Street, Room 210
Napa, California 94559-3092

Subject: Walt Ranch (# P11-00205-ECPA Project) Assessor's Parcels: 032-120-028; 032-480-007, -008, -011, -012, -013, -014, -015, -016, -017, -018, -019, -020, -021, -022, -023, -024, -027, -028; 032-490-004, -005, -006, -008, -009, -010, -011, -012, -013, -014, -015, -016, -017, -018, -019, and -020).

Dear Ms. Cahill:

The City of Napa Public Works Water Division (Water Division) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Walt Ranch vineyard development, which is the subject of Walt Ranch erosion control plan application No. P11-00205-ECPA (project). Our initial comments regarding the report are as follows:

The DEIR states that the proposed project would develop 507 acres on the 2,300-acre Walt Ranch, which was historically used for cattle grazing. The DEIR states that the 507 acres of new development would include 356 acres of vineyard, with the remainder comprising vineyard avenues, roads and other facilities. The DEIR states that southwestern 512 acres of the Walt Ranch property are located within the Milliken Reservoir watershed and that 208 acres of new gross vineyard development would be located within the Milliken Reservoir Watershed.

The Milliken Reservoir watershed comprises 6,000 acres of land. The southwestern portion of Walt Ranch represents 8.5 percent of the Milliken Reservoir watershed. The proposed project's 208 acres of new gross vineyard in the southwestern portion of Walt Ranch would use deep ripping and other construction techniques to develop almost 4 percent of the Milliken Reservoir watershed—all in an area just upstream from Milliken Reservoir.

In connection with that land development, the DEIR states that the proposed project would pump existing wells and drill new wells to extract some 213.5 acre-feet per year ("AFY") of groundwater to irrigate the new vineyards. The DEIR seems to indicate that the groundwater

extractions would occur within the Milliken Creek watershed.

The Water Division is a public water supplier that owns and operates Milliken Reservoir, which is an important source of supply that the Water Division uses to serve water to more than 86,000 people, including their homes and workplaces, and to provide fire protection and to meet other needs. The Water Division is concerned that the proposed project will cause significant adverse impacts to the public water supply from Milliken Reservoir despite the mitigation measures described in the DEIR. The Water Division objects to the proposed project, unless additional mitigation measures are imposed as conditions of project approval that will avoid or reduce impacts on the City's Milliken Reservoir water supply to a less-than-significant level.

The Water Division's detailed comments on the DEIR are as follows:

Based on the amount of grading proposed as part of this project, the Water Division is concerned that the subject project may increase the overall delivery of sediment or other pollutants into Milliken Reservoir by more than one percent (1%).

- In accordance with the California Surface Water Treatment Rule (SWTR), the Water Division is required to perform a watershed Sanitary Survey every five years to evaluate potential contaminant sources within the watershed that may impact drinking water quality. The DEIR states that the proposed project may construct a bridge over Milliken Creek and makes reference to up to 21 creek crossings on the property. A bridge and the subsequent increase in traffic to construct and to operate and maintain the new vineyards and related facilities increases the risk of hydrocarbons, oil and gas pollutants, fertilizer and pesticides being released into the watershed. Specifically vehicular traffic and the potential of an overturned vehicle to release such materials into Milliken Creek, which is a direct tributary of the Water Division municipal drinking water supply, could result in the loss of the municipal water supply for a period of time. The DEIR fails to analyze the significance of this reasonably foreseeable impact. The DEIR's reference to preparation of a hazardous materials business plan for the project fails to show that such a release would not occur, fails to show the extent of potential lost water supply, and fails to show how the lost water supply could be replaced or otherwise mitigated. The DEIR should be revised to provide that impacts analysis and to prescribe mitigation protecting the Milliken Reservoir public water supply..
- The proposed project includes the planting of 356 acres of vineyards that will apply pesticides and fertilizers "as needed." The introduction of pesticides into a municipal water supply is not acceptable and needs to be mitigated. Fertilizers and the increased concentration of phosphates are acknowledged to be the single most detrimental effect on drinking water quality. The impact of water quality degradation is particularly significant, because the Milliken Reservoir currently provides the highest quality water in the Water Division supply.. The Milliken Water Treatment Plant employs direct filtration only and cannot remove pesticides or fertilizers. Upgrading the Milliken Water Treatment Plant to remove such constituents of concern would cost an estimated \$20 million. That cost should be borne by the new land development project that threatens to compromise the high quality of the Milliken Reservoir water supply—not by the existing water customers.

- Impact 4.6-4 on Page 2-40 and at Page 4.6-50. The mitigation measure states that the automatic recorder for the purposes of operational monitoring “shall be set to collect data every 60 minutes for the first year.” Please clarify that this mitigation measure shall monitor the volume produced from each well in perpetuity and shall not end after one year.
- Impact 4.6-4 on Pages 4.6-49. The DEIR states “the complex nature of well interactions within a fractured volcanic aquifer system, combined with climatic variations, make it infeasible to predict with absolute certainty the long-term impacts associated with ongoing groundwater extractions at the project site.” The DEIR states that “. . . based on modeling and observations conducted during actual pump tests, there is a possibility that pumping of the wells on the Walt Ranch property may cause drawdown that could affect neighboring wells.” In response to that potentially significant impact, the DEIR states that “a monitoring program is proposed to monitor water levels during each phase of the project, so that a qualified hydrogeologist can determine the water level drawdown impacts to offsite wells, if any, as a result of pumping onsite wells to supply the Proposed Project.” Mitigation Measure 4.6-4 prescribes certain groundwater monitoring measures but does not state an objective standard that would trigger an action that would prevent significant impacts to offsite wells. To the extent this mitigation measure anticipates “shifting of groundwater production to other onsite wells for a period of time,” the mitigation measure fails to demonstrate that offsite well interference impacts will be prevented without causing new impacts from shifting vineyard irrigation pumping to a different location.
- The DEIR describes freshwater seeps and seasonal volcanic seeps at page 4.2-15. The Water Division has concerns about additional groundwater pumping in this area depleting artesian springs or seeps that contribute to surface water in the Milliken Reservoir watershed. The DEIR does not seem to specifically analyze the significance of this likely adverse impact. The DEIR should be revised to analyze this impact and prescribe mitigation to avoid it or reduce it to a less-than-significant level.
- Figure 3-4 shows the proposed extraction of groundwater from wells in the Milliken Reservoir watershed to irrigate lands that drain to the Capell Creek Watershed. The Water Division is concerned that proposed water development system will reduce water availability within the Milliken Reservoir watershed. Groundwater pumping, storage, and land application should not export water for use outside the Milliken Reservoir watershed from which it was extracted.
- Due to the size of the project and the amount of irrigated land that would be created with the project, the Water Division is concerned about the possible diversion of water that would otherwise normally enter the Milliken watershed. The DEIR at page 4.6-7 states that “the proposed project would rip approximately two to six feet in preparation for installation of vineyard” and that such “ripping could result in a change in the infiltration rate of a soil . . . enough that it could potentially change the soil classification.” The DEIR’s Tables 4.6-2 and 4.6-3 at page 4.6-36 show the proposed project would cause a significant reduction in runoff to Milliken Reservoir.

During a 100-year rain event, the DEIR states that the volume of runoff to the Milliken Reservoir watershed would fall by 3.8 percent to 4.7 percent. The DEIR fails to state the anticipated reduction in runoff volume in 2-year and 10-year rain events. During a 100-year rain event, the DEIR states that peak runoff to the Milliken Reservoir watershed would be reduced by 4.9 percent to 4.7 percent. During a 10-year rain event, the DEIR states that peak runoff to Milliken Reservoir watershed would be reduced by 8.3 percent to 9.2 percent. During a 2-year rain event, the DEIR states that peak runoff to Milliken Reservoir watershed would be reduced by 11.7 percent to 14.1 percent. The DEIR provides a conclusory assertion that the preceding runoff reductions “would be returned to streams a short time following a precipitation event because bedrock and the harder Sonoma Volcanics are located close to the soil surface over large areas of the project site.” (DEIR at page 4.6-37.) However, the DEIR does not seem to apply that generalized assertion to the specific acreage and actual geologic conditions that the Project will affect in the Milliken Reservoir watershed. The runoff reduction anticipated from the proposed project threatens to cause a significant adverse impact by reducing inflow to Milliken Reservoir. The DEIR should be revised to analyze and disclose that significant impact and to prescribe mitigation measures or an alternative project that would avoid or reduce this impact to a less-than-significant level.

- Section 3.2 paragraph 2 on Page 3-1 states land uses allowed in the AW (Agricultural Watershed) zone without a use permit include one single family dwelling per each legal lot, small residential care facilities, ...recreational vehicle parks, and campgrounds. The DEIR states that no housing or other such uses are now proposed or anticipated for future proposal at the project site and relies upon that assertion to limit the scope of the DEIR’s impacts analysis solely to vineyard development. (*See, e.g.*, DEIR at p. 4.4-23 [no “development of load-bearing structures or housing is not a part of the Proposed Project, so it is unlikely to expose people or structures to risk of loss, injury, or death involving landsliding”].) If the County of Napa were to approve the proposed project, it should impose a condition of approval prohibiting any future development of one or more single-family dwellings, small residential care facilities, recreational vehicle parks or campgrounds. To protect the public water supply from Milliken Reservoir, to the Water Division opposes the future establishment of the aforementioned uses in the Milliken Reservoir watershed.
- Among the largest threats to any existing watershed and municipal water supply is the threat of wildfire and potential organic loading that would occur as a result of fire. Development of this property and associated human presence and equipment increases the probability of wildfire and the need for helicopter transport of municipal supply water for emergency fire suppression. The DEIR should analyze this impact, disclose its significance and prescribe mitigation or an alternative project approach that would avoid the impact or reduce it to a less-than-significant level.
- The DEIR’s failure to disclose the significance of the impacts noted above has resulted in the DEIR’s failure to prescribe mitigation measures and project alternatives that would avoid or reduce the project’s significant impacts.

Thank you for allowing the Water Division the opportunity to review and comment on this Draft Environmental Impact Report. If you have any questions or if you need any additional information, please call me at 257-9319.

Sincerely,



Joy Eldredge, P.E.
Water General Manager

Cc (electronic): Mike Parness, City Manager
Michael Barrett, City Attorney
Jacques R. LaRochelle, Public Works Director
Phil Brun, Deputy Public Works Director – Operations
Michael Hether, Senior Engineer