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To the Napa County Board of Supervisors
RE: MOUNTAIN PEAK WINERY APPLICATION

Several studies including one by the University of Colorado in 2012 and adopted by the National Academy of Sciences have identified human activity as the cause of 84% of all wildfires. This includes industrial and farming operations, vehicle traffic, service providers, vendors, residents, visitors, arsonists and numerous others. Policies which invite and increase human activities in Napa County's fire-prone forested areas, inevitably increase the likelihood of wildfires.

Farming and crop processing operations invite the highest number of persons. Since Napa County has determined that agriculture (including visitors and events) is its best and highest land use, this does not mean that such activities ought to be entirely disallowed. However, if they are allowed, they ought to be minimal so that its operations do not significantly increase the risk of fire and the loss of life.

In the very least, adequate access and evacuation routes must be an integral part of all such permits.

As devastating the wildfires in 2017 and 2020 have been in Napa County, they did not play out a worst-case scenario. People had adequate warning to evacuate and wind conditions were low. In no case did the situation arise where the fire was instant under high wind conditions with heavy fire fighting equipment and panic evacuees simultaneously using the same substandard access routes.

Such a worst-case scenario played out in the Paradise fire where 85 people lost their lives because they were trapped, unable to escape on one road simultaneously used by firefighting equipment with many of its sections practically impassable by ordinary vehicles due to fire during a panic evacuation.

Despite substantial fuel reduction efforts in the Napa County hillsides by Napa County, PG&E and including by the local Fire Safe Councils formed only following the 2020 fires, **it would be foolish to assume that Napa County is immune to a worst-case scenario playing out. In fact, such likelihood has significantly increased in our current drought conditions.**

It is therefore imperative that crop processing operations be permitted only where they are served by two alternate routes and that both roads comply with the minimum Napa County Standard Road of 20 feet paved with 2 feet of drivable

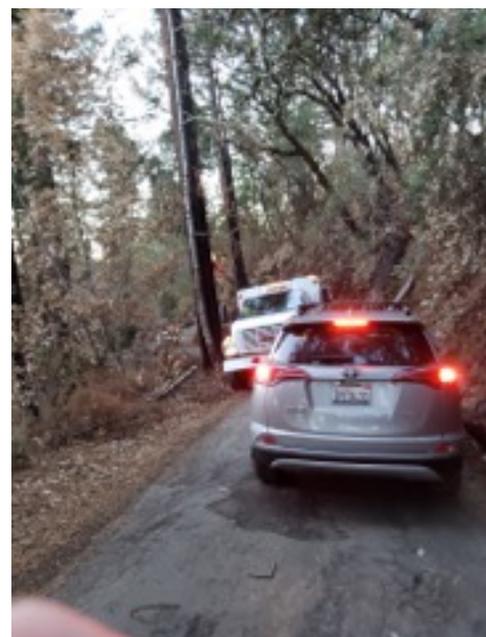
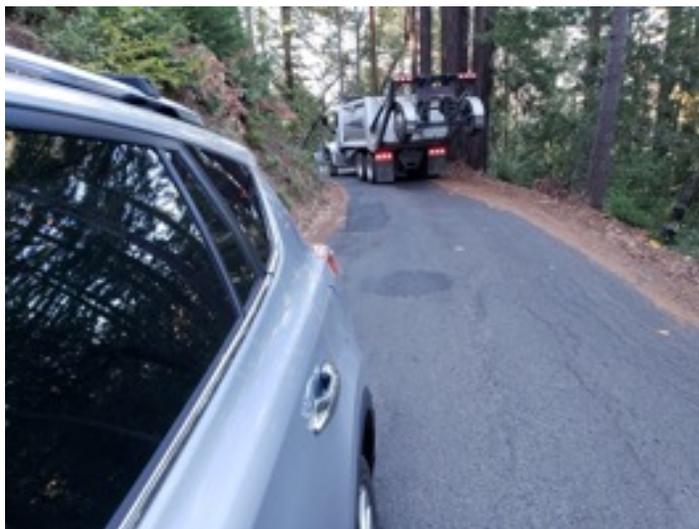
shoulder for a total of 22 feet. It is imperative that both roads comply with this standard because if one of them is blocked by fire, fallen trees or other obstacles deeming them impassable, the other must be equally suitable to accommodate both incoming heavy fire fighting equipment and simultaneous panic evacuations.

Even on 22-foot-wide roads, simultaneous truck and opposing vehicle traffic is problematic if wideouts are not available at regular intervals because both types of traffic occur in chains of vehicles. But it is a much better minimum requirement than the one Napa County currently applies and was willing to apply in approving this application.

The upcoming Mountain Peak winery hearing is the result of a court order requiring the Board to also consider data collected during the 2017 fires. However, it would serve the interest of the public well, if it also considered the insights acquired from the 2020 fires. After all, the measures undertaken by Napa County, PG&E and the formation and actions of the local Fire Safe Councils were a result of the 2020 fires not of the 2017 fires. To my knowledge, Napa County has not solicited input from the various Fire Safe Councils in connection to this application.

The Mountain Peak winery application is served by Soda Canyon Road many sections of which do not comply with the Napa County minimum standard road, neither is the winery served by a public secondary access road but rather by a narrow, winding dirt road over private property patently inadequate to accommodate concurrent traffic as described above.

The approval of this application will unnecessarily heighten the possibility of a wild fire occurring in the first place with inadequate firefighting access and escape routes during a worst-case scenario incident as described above, thus heightening the likelihood of the loss of life.



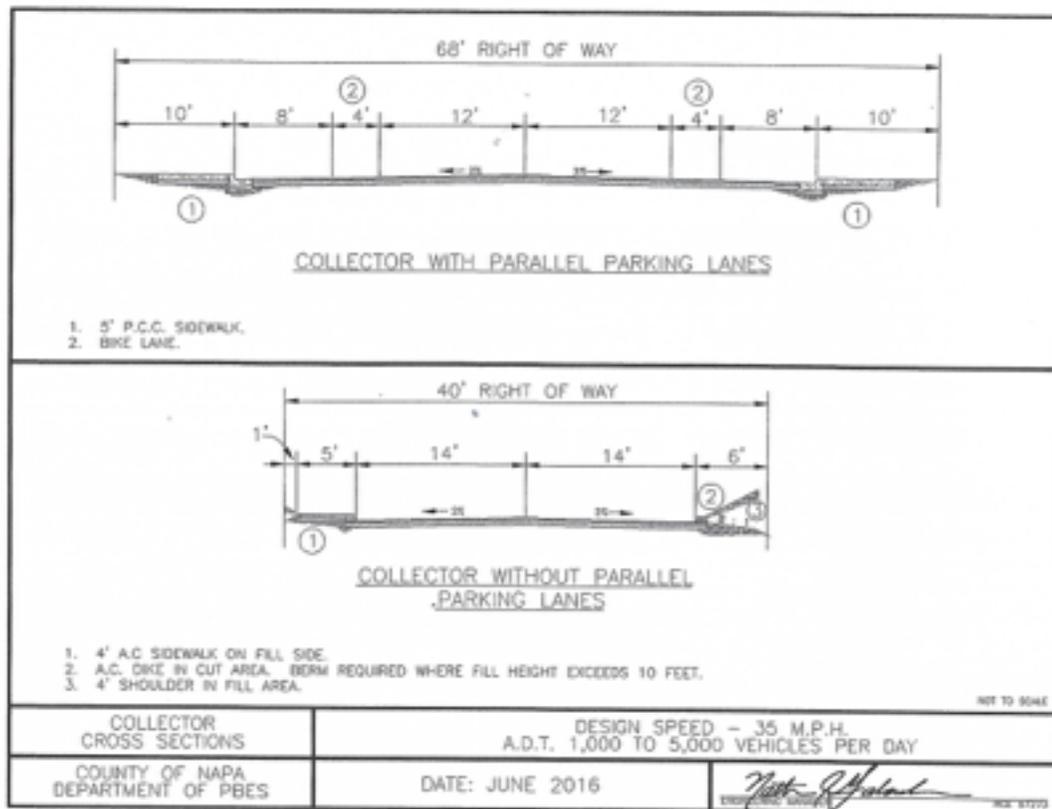


Smithsonian Feb 28, 2017: Study Shows 84% of Wildfires Caused by Humans

One more note on this Application:

Napa County has labeled Soda Canyon Road a "Collector Road" thus avoiding the (in this case) 1-mile maximum length specification for a dead end road. However, a Collector Road is not a Collector road unless it complies with the Napa County applicable specification which I attach.

As you can see, this specification requires 28 feet paved width plus 12 feet of shoulders, 5 of which must be drivable. In addition, this specification applies only if the road is "Without Parallel Parking Lanes". This, clearly is not the case with Soda Canyon Road in its current condition both in terms of width and in terms of parking. Currently there is no parking prohibition along many stretches of Soda Canyon Road.



If parking is permitted along any stretches of the road, the Napa County specification for a Collector Road With Parallel Parking Lanes applies which is 46 feet paved width, 2 feet of curb and gutter (one foot on each side) plus 20 feet of drivable flat shoulders within a total of 68 feet right of way.

Presumably, if parking lanes are permitted on one side only, half the road would need to comply with the former and the other half with the latter specification. This would be 38 feet paved, 16 feet of shoulder of which 10 must be drivable, plus a 1-foot gutter, all within a 54 feet right of way.

Obviously, none of these specifications are satisfied by Soda Canyon Road to be a Napa County Standard compliant Collector road in fact rather than in name.