

March 19, 2019  
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Commissioners  
Napa County Planning Commission

re: DARMS LANE WINERY , Application for Winery User Permit #P16- 00017 & VIEWSHED #P18-00152,  
comments for the continued Hearing on 3/20/2019

Please accept my comments concerning this winery application before the Commission on March 20, 2019.

### **Condition of Approval, Doc B**

The COA is very important as an historical document and should contain the major points and operating conditions representing the agreement (Use Permit) between Napa County Planning and the property owner. The COA must contain a clear and concise list of operating parameters of the Use Permit. There should be no ambiguity of the conditional agreement for Future viewers of the COA, be they planners, code compliance reviewers, the neighbors or general public. The document should be crystal clear on the do and don't of the agreement.

If the COA is ambiguous or mushy, with explanations or definitive parameters described in other project documents, the COA is not providing the guidance needed for others to ascertain the true operating parameter of the Use Permit and the Owner's compliance with the COA.

In my comments of 3/5/2019 for the 3/6/2019 Planning Commission meeting, I queried the water lines crossing the Blue Line Creek on the Eastern edge of the Vineyards and the Project Boundry, photos 47, 48. These water lines transport water from the Easement Well on the adjacent property, providing water to the Applicants Property.

### **WAA Doc F**

Water is the life blood of the winery proposal and the ability of the property to provide the necessary water resources to accommodate the proposed use is paramount to Napa County's acceptance of the proposed Use Permit. If the water resources are not adequate for the proposed use, then the Use Permit will not provide for the Health and Safety of the Owner, the neighbors and the residents of Napa County, a core responsibility of this regulating authority in Napa County.

In my previous comments of 3/5/2019 I mentioned concerns with the quality of water from the supply wells on and off the property. There are no documents indicating that these water sources are providing water that is useable to the vineyard, the winery and the owner, employees and visitors to the winery. In my previous comments I mentioned the saga of the Woolls winery (Progeny) that did not recognize their main well water was detrimental to the healthy growth of their vineyard.

If the water wells on the Applicant Property and adjacent property providing water to the Winery Site are not of sufficient quality and quantity to meet the project requirements, then the Application is not viable and in the interests of the regulating authority.

If the water is of insufficient quality for the proposed need, and treatment is necessary (reverse Osmosis, etc) to treat the water before consumption, then the WAA needs to discuss the quantity and disposal methods of the waste stream from the treatment regime. This will up the quantity of water necessary for the proposed use.

I queried the quality and results of the water well testing for production quantity, yield. The well testing was not completed by a licensed contractor for such a testing regime. Certified testing is the only method of determining the property's ability to meet the water needs of the proposed project.

I found the project documents inadequate to make this determination. Also, there was no explanation of the need for an off property well to supply needed water. Was the onsite well water adequate in quantity and quality for the project application?

Many of the properties on Darms Lane are supplied with Napa City Water from the main supply pipe running along the Railroad Tracts next to Highway 29. Does the property with the off site well receive or have right to water from Napa City? Does the Project Property receive or have rights to water from Napa City? Is this water contracted for use in commercial or residential use only?

Also, there is a water hydrant half way down Darms Lane, which is supplied with water by the Napa City Main at the RR tracks. On this hydrant is a water meter used to sell trucked water to contractors or property owners. This is the very type of meter used by Woolls Ranch to irrigate their vineyard after they discovered a high Boron content in their irrigation well water, hoping to remediate the detrimental effect of the inappropriate well water. Woolls purchased and hauled 1.7 million gallons of water into the vineyard.

Does this metered water being used for vineyard irrigation on Darms Lane, and indicating a poor well water quality or low water availability in the neighborhood wells?

Water Recharge from Rain water. I questioned the use of Drain Tiles on the project site as a necessary variable for determining the adequacy of the recharge to meet the needs of the proposed use. Are there drain tiles, french drains, under the vineyards on the project property? What is the extent and ability of these drain tiles to remove the Rainwater used in the recharge calculations? All the vineyards along Solano Avenue on the west side of Hwy 29 use drain tiles in their vineyards to remove recharge water down to 8' below the surface and discharge it into ditches and creeks along Solano Avenue, limiting recharge. What is the quantity of this water removal and how does it affect the recharge calculations used to qualify the water needs of the vineyard and winery proposed production?

Is the vineyard dry farmed or drip irrigated and how does this affect water well consumption calculations for the proposed project?

### **CONCLUSION TO COMMENTS:**

I suggest that the Planning Commission Continue this examination of the application to a later date to allow the applicant to provide the missing documentation and a higher quality of oversight documentation. These are critical areas within the Darms Lane Neighborhood that need to be clarified.

Best, Gary