

June 6, 2022

Public Comments to NC LAFCO concerning Item 6A: Sphere of Influence Amendment Request Involving the City of American Canyon, American Canyon Fire Protection District, and 1661 Green Island Road.

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I agree with the Staff recommendation to deny the requested Sphere of Influence Amendment (SOI) for 1661 Green Island Road.

After reviewing the documents provided by the Land Owner of this large parcel, adjacent to the Napa River and featuring elevated, rolling hills up to 80 feet in elevation above the river in one contiguous parcel of 157 acres. The parcel was recently developed as a vineyard that has since been reduced to 60 acres based on the owners opinion that the soil has been contaminated by salty irrigation water provided by the American Canyon Recycled Water and the adjacent intertidal, Brackish water of the Napa River. The owners and their consultants are suggesting that these sources of water have spoiled the parcel's ability to support premium wine grapes.

The owners investigation and conclusions are at the heart of my comments as I try to understand the engineering aspects of their efforts to provide information that will help NC LAFCO decide the future of this agricultural land.

LAFCO staff has added Additional Key Considerations on page 14 of the staff report, the first bullet point concerning G.C. Section 56064 defines Approximately one-third of the affected territory qualifies as "prime agriculture". Was this information available to the owners before their purchase of the parcel in 1996?

Another question concerns the irrigation water supplies available to the owners. There are no water wells on the property and there is no discussion of the available groundwater in the area and adjacent parcels.

Irrigation water was supplied by the American Canyon Recycled Water operations, but no informational reports or dated records were submitted that quantify, quality and the dates and time of the irrigation supply or the quality of the water used. The vineyard operators, NORD, have detailed records of Agricultural Chemicals added to the vineyards, Date, Time, quantity per acre but supplied no records of the irrigation timing, quantity and quality of water. If the owners suspected that the irrigation water was contributing to a poor harvest quantity or quality, one would assume that they would be paying close attention to all aspects of the irrigated water and have records of this attention.

Harvest records of grape quantity and quality by varietal and acre would provide a history of

their efforts to produce a quality harvest from Prime Agricultural Land.

Another report that would shed light on the Prime question would be the Crop Care report that is referenced in the UBS letter that detailed an evaluation for a prospective purchase of the parcel. The Crop Care report seemed to play a part in the decision by Mumm to avoid a long term agreement for grape purchase. This report was referenced but was not provided for LAFCO consideration in this matter. Why?

These missing documents would have helped LAFCO with the evaluation of the owner's request and should have been included.

The request for a change in the SOI should be denied.

Gary S Margadant