

City Council

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City of Sebastopol

February 9, 2015

Traci Tesconi, Project Planner
County of Sonoma
Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, California 95403

Re: PLP14-0090
JJW Real Estate LLC, Attn. Joseph Wagner
5150 Sebastopol Road
APN: 060-040-017

Dear Ms. Tesconi:

Thank you for consulting the City of Sebastopol regarding Application PLP14-0090, an application from JJW real Estate, LLC, Joseph Wagner, for a Use Permit and Administrative Design Review for a new winery and distillery with an annual maximum production capacity of 500,000 cases of wine and 250,000 gallons of distilled spirits, at 5150 Sebastopol Road. We appreciate PRMD's diligence in notifying the City of this and other applications in the Sebastopol area.

In that the proposed project would be located on critical Sebastopol transportation corridors (Highway 12 near Llano Road, as well as the Joe Rodota Trail), and in a environmentally sensitive, community separator area (the Laguna de Santa Rosa area), it is of heightened concern to our City.

The City of Sebastopol City Council heard a presentation from, and asked questions of the applicant, received numerous public comments via emails and public testimony, and discussed the application at the City Council meeting of February 3, 2015.

Due to numerous serious concerns and potential significant environmental impacts, the City recommends that this application be denied.

- The scale and intensity of the proposed project is completely inappropriate to the rural location and zoning designations. The processing elements of the project are of an industrial scale and should be located in an industrially-zoned area; the scope of proposed entertainment and other events is of commercial-level intensity and should be sited in a commercially-zoned area.

- Given the scale of the proposed project and its constrained and limited access, the City has serious concerns regarding traffic impacts, roadway capacity, and safety. Turns from the heavily-traveled, high-speed Highway 12, and impacts on the Joe Rodota Trail are of major concern. Highway 12 near Sebastopol is routinely highly-congested, with significant delays regularly experienced by drivers. The project will add a considerable number of trips to the roadway network, increasing delays. Project related-left turns may pose a particular safety issue. And, safety impacts to what is likely the most popular bicycle and pedestrian trail in Sonoma County are of significant concern, as project traffic would have to cross the Trail. This is unacceptable, and given the scale of the proposed project, these are significant and unmitigatable environmental impacts.
- Water impacts are potentially significant. While there are varying statistics on the amount of water needed to produce wine or spirits, there is no debate but that it is considerable. The project proposes production of very large amounts of wine and spirits, which would result in substantial water use, which would be in addition to water needed for other aspects of the operation, including numerous major events. We understand that the project would have access to some recycled water, however this poses other health issues in the context of agricultural use which need to be addressed. And, this proposed project water use occurs in the context of region-wide drought conditions, an uncertain climate future, and with concerns about the viability of wells providing essential water supply for existing homes, agricultural uses, and businesses in the area.
- All Sonoma County cities have adopted urban growth boundaries and community separator areas, and the County has supported directing urban growth within the urban growth boundaries. The project is located in what is a community separator area between Sebastopol and Santa Rosa and is not within an urban growth area. As an intense, industrial-scale use with the additional overlay of numerous and large entertainment components, the project conflicts with the character of the community separator use and the objectives of urban growth boundaries.
- Impacts on the Laguna de Santa Rosa ecosystem are highly concerning. The Laguna is a critical natural resource, and our City as well as other jurisdictions have invested considerable efforts in protecting and restoring its ecological functions. Water use, night lighting, endangered plant and animal species, noise, stormwater, and traffic impacts are all topics of significant concern. In addition, periodic flooding may vehicle prevent access to the property.
- Public safety impacts on the City of Sebastopol are of substantial concern. The project site is in unincorporated territory. The Sebastopol Volunteer Fire Department often is requested to respond to emergency calls in this area, and additional calls for service appear likely to be generated in conjunction with the numerous planned public assembly events, as well as the industrial operations of the project.

For the above reasons, the City of Sebastopol recommends that the County deny this application.

Should the project continue to be processed, we request:

- The City of Sebastopol be provided with any additional studies related to the application, such as any traffic, water, or other studies that may have been prepared by the applicant or the County.
- The initial public and agency comment period be extended a minimum of 30 days.
- If they have not already been contacted, several other agencies be provided the referral, including the County Water Agency, NOAA, and the Highway Patrol.
- A full Environmental Impact Report be prepared, which should examine traffic, parking, water (including use of treated Subregional wastewater, and proposed use of recycled water from winery and distillery operations), safety, biotic, noise, stormwater, visual, and other impacts in detail, and should also review potential cumulative effects of this project in conjunction with other existing and planned winery, distillery, brewing, and event/entertainment projects in the County.
- The applicant, PRMD, and EIR should review possible changes to the project, including reduced production levels, a substantially reduced number of events, reductions in new square footage, changes to operating hours particularly for events, alternative access opportunities, and other revisions that would reduce environmental impacts.
- The County should consider the precedent-setting nature of any action on this application.
- Our City be provided with notice of any planned hearings or permit actions.
- Given widespread concerns about large wineries with associated event activities, generally located in rural areas with significant infrastructure limitations and historic patterns of low-intensity land use, the County should consider a moratorium on these types of projects, to provide time to consider developing appropriate standards and limitations for these types of projects.

We also suggest that PRMD take into consideration the comments provided by organizations such as Sebastopol Water Information Group (SWIG); the Laguna de Santa Rosa Foundation; Sonoma County Conservation Action; The Rural Alliance; and other, numerous written comments received and attached to this letter for your information, as well as the public comments stated in opposition to this project as noted at the Council meeting draft minutes for the February 3, 2015 City Council meeting.

We appreciate your considerations of these concerns. Please notify us if there are other opportunities to comment in the future.

Let us know if you have any questions.

Sincerely,



Patrick Slayter, Mayor

Enclosures:

- Correspondence received by the City of Sebastopol regarding the proposed project
- Draft February 3, 2015 City Council minutes regarding the proposed project

cc:

City Council
Sonoma County Board of Supervisors
Demaie Rubins, Summit Engineering
Joseph Wagner