

April 5, 2016

Tennis Wick
Director
Permit and Resources Management Department
County of Sonoma
2550 Ventura Ave.
Santa Rosa, CA. 95403

Re: Kenwood Vineyards: PLP15-0067 (and PLP15-0011)

Dear Mr. Wick,

The Valley of the Moon Alliance (VOTMA) understands that PRMD has scheduled a “design review” meeting on April 20, 2016 with Kenwood Vineyards (KV), the applicant in the referenced use permit applications. That meeting is presumably intended to work through the proposed design associated with KV’s application to relocate and significantly expand its tasting room business operations. VOTMA writes to urge PRMD to reconsider whether it is the right time to have such a discussion in view of the still unresolved issues relating to traffic impacts and other environmental impacts of the proposed project and the extent to which the project required more detailed review, including an EIR which would assess alternatives to the proposed application that would reduce or mitigate the probable adverse impact that will result from the significant expansion contemplated by KV. As much as KV would like to move directly to discussing the design specifics, it has yet to provide the required information that would allow meaningful conclusions for an Initial Study assessing the project in order to comply with CEQA. As such, it seems to VOTMA that both PRMD and KV are in serious danger of getting the cart well before the horse on this project.

VOTMA is aware from the SVCAC meeting held on February 24, 2016, on application PLP15-0067 that KV has proposed some modifications to the initial application, particularly relating to its proposed “Marketing Plan.” Although PRMD has not circulated that revision or asked for comments, VOTMA will provide some comments relevant to the evolving procedural status of this application. These comments are supplementary to VOTMA’s November 12, 2015 comments, which raised among other things the improper piece-mealing of PLP15-0011 and PLP15-0067. That the former application has apparently already been approved does not, in VOTMA’s view, exonerate KV from undergoing a full assessment of the combined impacts of the two projects for purposes of PRMD’s approval of the latter. That would include project (i.e., the KV “master plan”) water use, traffic impacts, bus and car parking plans, food preparation and service capabilities, land excavation and contouring, aesthetics, noise etc.

To VOTMA's knowledge KV has not yet produced the bulk of the studies that should be called for in order for a complete assessment of this project. KV has indicated that those studies will be forthcoming shortly, at least in part. VOTMA suggests that for transparency purposes it would be helpful if PRMD publicly articulated the nature and scope of the studies it believes are needed. Taking the traffic study as an example, what existing, pending or known likely projects along Highway 12 are to be included in the KV traffic and transportation analysis? If PRMD has not articulated that information the validity of any Initial Study conclusions could be jeopardized.

VOTMA recognizes that in one sense KV is simply asking to relocate and upgrade its existing tasting room. So why is VOTMA registering concern and objection? There are two simple responses to that question. First, KV's proposed impacts are not the only ones on the horizon in the area. There is the VJB proposal, the likely impending construction of the Graywood Ranch project, the Ledson winery and tasting room proposal, the construction of several wineries across from Oakmont, among others. In VOTMA's view, it is imperative that PRMD apply a broad screening vision to the cumulative impacts (traffic and other) facing this beautiful stretch of Highway 12.

Second, it is abundantly clear even from the scant information currently available that KV's Phase II of its Master Plan is likely to have a significant impact on Kenwood traffic. Although VOTMA has no independent information on the expected increase in annual visitors resulting from this project, at the SVCAC meeting KV's immediate neighbor to the north reported that KV's own historical reconstruction of the baseline reflects annual visitors in the range of 25,000 persons per year. Using KV's Market Plan as a guide (and assuming that tasting room traffic is only 1000 per week on average), KV seeks a use permit to host over **78,000** visitors a year maximum, *excluding industry-wide events*. VOTMA recognizes that the actual visitors may be thousands less. But even so, to increase the visitor count by perhaps **50,000** people per year or more than **200% over the baseline**, very easily, in VOTMA's view, constitutes a de facto fair argument that an EIR is required for this project. Added to the traffic issue (cars, buses, and other event vehicles) are the noise and aesthetic issues associated with cutting away a prominent east-facing slope and commencing commercial tasting room and food-related services at that location. As VOTMA understands the proposal, the new tasting room will be situated on an open east-facing down-valley hillside (and, ironically, in front of housing that was required during permitting to be designed to blend into the surrounding canyon backscapes). The likely extensive cut and fill required to safely locate the tasting room and expanded parking lot(s), the visual disruption resulting and the general noise resulting from the use of the tasting room for wine and food service under the new business plan, make it apparent that there are significant potential environmental impacts associated with this project (especially when combined with the Phase I Master Plan project).

In the face of these legitimate issues, PRMD has yet to make a statement or provide any indication as to its intended scope of CEQA review. Instead, it has scheduled a

“design review” meeting for the proposed project even before the applicant has provided the required studies to complete the Initial Study. VOTMA respectfully requests that PRMD put the cart back behind the horse and address the scope and nature of the impacts review required for this project (and its sibling) and use the resulting information to provide the public the opportunity to provide input on whether the project as proposed should be advanced alone or should also include modifications and mitigations (including relocation) which downscale the project. The Chair of the SVCAC, among others at the SVCAC meeting, suggested that rethinking the size/scope of the project should at least be considered.

Although VOTMA appreciates that KV is looking for quick closure on the project permitting, it might be more appropriate for PRMD to inform the new owners of KV that CEQA may not be so cavalierly disregarded. It seems evident that a proposal like this to cut away part of an open hillside in a scenic corridor to locate a wine tasting and food serving open air and indoor facility with a large parking area that contemplates accommodating over 70,000 guests per year would not be a fast track permitting exercise in any circumstance. VOTMA assumes PRMD will not be treating it as such.

Thank you for the opportunity to provide further comments on this proposed project.

Very truly yours,

Kathy Pons, President of the Board
Valley of the Moon Alliance

Cc: Melinda Grosch
Jeremy Wright
Lynn and Chris Koch
VOTMA Board