

County of Sonoma  
Permit & Resource Management Dep't.  
Attention Traci Tesconi, via e-mail [traci.tesconi@sonoma-county.org](mailto:traci.tesconi@sonoma-county.org)

RE: UPE14-0008, 7079 Westside Road

Dear Ms. Tesconi:

Permit this letter to supplement our letter dated January 14, 2015, on the above captioned application. A copy of that letter is appended for reference (attachment #1).

For the reasons stated in the above referenced letter and as augmented and reinforced in the letter, the Westside Community Association requests that the County staff recommend to the BZA a denial of this application because the proposed project at this location will be detrimental to the health and safety of persons residing or working in the neighborhood and detrimental to the general welfare of the area.

Specifically:

1. Restricted sight lines and close proximity to several adjacent tasting rooms would cause traffic safety issues
2. Very limited setback to adjacent properties will be create significant unmitigated noise impacts
3. Large winery, office and hospitality complex and operation is out of scale with other facilities on Westside Road and incompatible with the neighborhood
4. Disproportionate focus on hospitality and entertainment is inconsistent with the General plan
5. Location within the scenic corridor would be inconsistent with the Scenic Resource Element of the General Plan
6. Situated in a high concentration of existing tasting rooms and wineries detrimental to the rural character

**1. Significant impacts to public safety would result from the two opposing driveways with insufficient sight distances located in close proximity to three other tasting rooms.**

The W-Trans traffic study dated March 10, 2016 does not adequately address the traffic safety and impacts associated with this project.

First, the project will consist of two driveways directly opposing each other on a section of Westside Road with very limited sight distance. Attachment #2 shows a sign for an event at a winery located right next door, warning drivers that there may be stopped traffic during an event. This sign was placed at the location of the existing driveways for the proposed Project. This photo illustrates the challenging sight distances that currently exist for drivers visiting the three existing wineries located in the quarter mile stretch of road where the Project is to be located.

Second, the prevailing speed analysis indicating a speed of 35 mph appears to be inaccurate. Data for local drivers indicate the speed at which most drivers pass the Project driveways is approximately 40 mph. The prevailing speed study should be independently verified.

Third, The W-Trans study did not apply the correct standard for a significance threshold and mitigations required for Discretionary Use Permit projects per the *Sonoma County Guidelines for Traffic Impact Studies*. As required by Section 6 of these guidelines, projects requiring traffic impact studies must meet 11 thresholds of significance. The County document states:

"A project would have a significant traffic impact if it results in any of the following conditions:

9. Sight Lines: The project constructs an unsignalized **intersection (including driveways)** and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based on Caltrans criteria for state highway intersections and AASHTO criteria for County **roadway intersections**." (Emphasis added)

The requirement for Staff to use the AASHTO **roadway intersection** standards was confirmed in the hearing for the project at 4603 Westside held on June 1. The W-trans study only uses the shorter "stopping distance criteria for private driveways. Unless the proper sight distance criteria is achieved or the impacts mitigated, the County cannot approve a mitigated negative declaration for a project with a significant **unmitigated** impact.

At the prevailing speed assumed in the W-trans study of 35 mph, a sight distance of 390 feet is necessary in both directions. At 40 mph the required sight distance is 445 feet. The W-Trans study must be redone using the correct AASHTO roadway intersection standard – Attachment # 3. The Department of Transportation and Public Works is requiring removal of a hillside to increase the sight distances to the north, but even with this mitigation, it is not sufficient to create adequate sight distances.

Fourth, even if the County was relying on stopping distance as opposed to sight distances for assessing traffic safety, the possibility of queuing onto Westside Road must be considered. With events of up to 300 people entering and exiting the two opposing driveways there are likely to be backups on Westside Road. This queuing is precisely why the William Seylem winery posted the above referenced sign warning drivers about potential for stopped traffic at its event right next door. The issue of queuing was also considered by the BZA as a reason for denial of a project at 4603 Westside that had similar issues using the minimum stopping distance standard. Meeting the minimum stopping distance standard is simply not sufficient to ensure the safety of the public in this stretch of Westside Road with limited visibility and three other wineries in such close proximity.

Finally, joint road use conflicts with visitors, local traffic, large trucks and bicycles all using this stretch of Westside Road were not addressed at all. Westside Road is a heavily used bicycle route with a bicycle LOS E. The April 2017 Level of Service Analysis shows that Westside is already at Level of Service C, with at least three (3) known projects in addition to the subject project, the Level of Service Analysis should address cumulative impacts of existing and known projects as well as potential of increased visitation at existing wineries for additional promotional and hospitality activities.

## **2. Noise assessment is incomplete and prepared contrary to General Plan Policy NE-1c.**

The potential for noise environmental impacts from the Ramey Winery project located at 7097 Westside Road (UPE14-0008) was assessed and reported by Illingworth & Rodkin (I&R) in three *Environmental Noise Assessment* documents dated October 9, 2013, September 4, 2015, and March 7, 2017.

According to General Plan Noise Element Policy NE-1c, *the total noise levels resulting from new sources shall not exceed the standards in Table NE-2 as measured at the exterior property line of any adjacent noise sensitive land use.* The two major (critical) General Plan inconsistencies in the Ramey noise assessments are:

- The adjacent noise sensitive land use (APN 110-240-024) south of the proposed winery and wine cave location was omitted from the assessments; and
- Noise levels for the noise sensitive land use (APN 110-240-020) south of the proposed wine tasting and events location were measured at the “residences” rather than the exterior property line.

As a result, a determination cannot be made that the project will not result in: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; and a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project.

Additional noteworthy observations are:

- The omission of APN 110-240-024 from the analysis means ambient levels representing this noise sensitive land use were not collected.
- The location of the proposed winery places winery related noise sources including but not limited to truck loading, unloading and forklifts in close proximity to shared property lines (approximately 10-feet). Since noise levels are measured 50-feet from the source and 50 feet extends beyond the exterior property line, meeting the Table NE-2 standards is problematic.
- Curiously, the September 15, 2015 “Environmental Noise Assessment Addendum” focused on outdoor amplified music generated at the walnut grove in relation to APN 110-240-020 measuring the noise at the exterior property line. However, Policy NE-1c was not applied to or enforced for the other proposed new noise sources (as recent as March 2017).
- The 2013 and 2017 assessments included a decreasing and increasing of ambient levels (on paper) at residences on the APN 110-240-020 parcel. Use of this methodology (which was unexplained other than location in relation to the ambient survey LT-1) and

the subsequent calculations presented in the tables are irrelevant since the homes (R1, R2 and R3) are located on the same parcel with the same exterior property line. Also, Policy NE-1c does not include an option to measure noise at a residence.

- Footnote 1 on page 8 states: *These source levels have been used to analyze amplified music at non-concert type special events at over 30 winery projects since the current Sonoma County General Plan (2020) was adopted and have been also adopted by the Sonoma County Winery Event Working Group as typical noise levels for winery event activities.* This is not factual.
- Using the L08 category (five minutes in any hour) for driveway and parking lot noise for busy weekends and events is not realistic. The L08 category for forklift noise is also unrealistic particularly during bottling and the crush season. Making the no impact determination (or the selection of effective mitigations) is dependent on an analysis of maximum allowable noise exposures, which is dependent on the appropriate hourly noise metric for each noise source and circumstance.

Further critique will be deferred to the completion of an environmental noise assessment inclusive of all noise sensitive land uses in the vicinity of the project on the east and west sides of Westside Road that is also consistent with the General Plan.

### **3. The large size and intensity of winery, hospitality and office complex is out of scale with other Westside Road facilities and incompatible with the neighborhood**

As stated in the WCA January 14 letter, the Project is simply too large in scale compared to other winery/tasting rooms recently permitted on Westside Road. Attachment #6 is a summary of the other production facilities permitted in the Westside Area, which indicates an average of less than 20,000 cases.

Attachment #7 is a calculation of the square footage of various project components based on the preliminary design drawings.

Overall construction of 46,000 sq. ft., four tasting rooms, three kitchens, two overnight lodgings, 6,000 sq. ft. of office space and 11,700 sq.ft. of hospitality area is simply too much commercial development for a rural area. This is particularly the case given the other 29 permitted facilities in the Westside Area.

### **4. The large land area and facilities dedicated to non-agricultural activities is not consistent with the general plan requirement that such uses and facilities be limited in scale and intensity, and secondary to agriculture.**

General plan police AR6 states that visitor serving uses should be secondary and incidental to local agriculture. As stated in the WCA January 14 letter, the scale of visitor serving uses is disproportionate to the processing facilities and as mentioned above, out of scale with surrounding operations. Attachment # 8 shows the approximate area of the primary hospitality operation, and covers nearly 3 acres. The four tasting rooms, three kitchens, lodgings and other event space comprise nearly 65% of the size of the processing area.

The 24 event-days for up to 300 guests is much larger than for neighboring wineries. The average number of events per facility on Westside Road is 11, including industry events. The most recent project approval was for 12 events which included 8 days of industry events.

**5. The reconstruction of abandon hop kiln structures to tasting rooms, food service facilities and lodgings within the scenic corridor conflict with the General Plan Scenic resource element, and detrimental to rural character.**

See WCA January 14, 2015 and December 2, 2014 letters regarding the inappropriateness of reconstruction and intensification of use of existing farm structures within the scenic corridor.

As stated in these letters, Westside Road embodies Healdsburg's rich agricultural heritage. Keeping these old structures located within the scenic corridor in their natural state should be a priority. Attachment #9 is a picture of an old barn in the scenic corridor on Westside Road is one of the most recognizable scenes of Sonoma County agriculture. Converting such structures as the one shown in the photo, or the hop kilns at the Project into a tasting rooms, surrounded by parking with big signage and very commercial oriented uses should not be permitted. Such buildings could be used as barns for equipment storage for example.

Also, the County was not willing to allow conversion of an agricultural building in the scenic corridor to be converted to a tasting room for a recent project proposal on Westside Road.

**6. The location of the winery, food service and logging and entertainment facilities in such close proximity to three (and potentially four such facilities) within a half mile will constitute a detrimental concentration under the General Plan.**

The proposed project would result in the fourth tasting room in .25 miles. Attachment # 10 is an aerial view of this concentration of tasting rooms

The BZA is considering concentration in its approvals of applications for visitor serving facilities and activities. In a recent denial of a project in the same vicinity as the Project (4603 Westside Road PLP14-0031), the BZA resolution denying the project states:

*"2. Event and Tasting Room Traffic .... Westside Road has 29 permitted wineries along the roadway, and traffic on Westside Road includes operational traffic from wineries, travel to/from tasting rooms and winery event traffic. The Project would result in four wineries with tasting rooms and events within 0.6 miles. The proposed winery is adjacent to MacRostie Winery at 4603 Westside Road to the south and*

*near three tasting rooms to the north: VML Winery and Alysian Wines at 4035 Westside Road and Bacigalupi Winery at 4353 Westside Road."*

*“The proposed addition of another winery and tasting room in close proximity to the existing tasting rooms would contribute to a concentration of uses that would be incompatible with the neighborhood character and deleterious to the rural character of the immediate area.”*

In addition, as the attachment to the January 18 letter shows, that with 29 permitted facilities on Westside Road, any additional facilities or events would have a significant cumulative impact on the number of events and visitor serving activities.

For the above reasons, the WCA requests that the Project be denied.

Sincerely,

Westside Community Association  
Advisory Committee

cc: Jennifer Barrett [Jennifer.barrett@sonoma-county.org](mailto:Jennifer.barrett@sonoma-county.org)  
Tennis Wick [tennis.wick@sonoma-county.org](mailto:tennis.wick@sonoma-county.org)

#### Attachments

1. WCA January 14, 2015 letter w/ attachements
2. Event warning sign at adjacent winery
3. AASHTO sight distances for roadway intersections
4. Aerial view of closest residence to property line
5. Aerial view of closest residence to property line
6. Production capacity of Westside Road wineries
7. Calculation of sq. footage of hospitality areas
8. Hospitality area dimensions
9. Iconic barn on Westside Road
10. Aerial view of concentration area