



David Rabbitt  
Board of Supervisors  
County of Sonoma  
575 Administration Drive  
Room 100 A  
Santa Rosa, CA 95403

Pat Gilardi  
Larry Reed  
Commissioners  
2nd Supervisorial District  
Planning Commission  
and Board of Zoning Adjustments

Tennis Wick  
Permit Sonoma Director  
  
Tyra Harrington  
Code Enforcement Manager  
Code Enforcement

Mark Franceschi  
Code Enforcement  
Supervisor  
Code Enforcement

Eduardo Hernandez  
Planner III  
Planning Project Review  
  
County of Sonoma  
2550 Ventura Avenue,  
Santa Rosa, CA 95403

March 28, 2022

Re: Ghilotti Project at APN 020-130-037; Use Permit Application UPE21-0064

Dear Mr. Rabbitt, Ms. Gilardi, Mr. Reed, Mr. Wick, Ms. Harrington, Mr. Franceschi, and Mr. Hernandez,

We are writing to express our opposition to the extensive development at 4485 D Street Extension in Petaluma, and the Use Permit Application (UPE21-0064) recently submitted for this property. While we appreciate the County's enforcement actions to date, they appear to have made little to no difference in how the applicants are developing and using the project. As described below, the developers of this site continue to disregard and abuse State and County laws, zoning regulations, and building codes.

Our objections are based on the following:

- The applicants' 5,000 square foot barn, constructed under an Ag Exempt permit in 2021 and later cited by Permit Sonoma for multiple code violations, is being used as an Event Center ([www.villavanto.com](http://www.villavanto.com)).
- The proposed uses of the Event Center, including 28 events – weddings, corporate events, and fundraisers – for up to 4,600 attendees annually, do not comply with LEA zoning under the Sonoma County General Plan LEA land use category. They are not agricultural promotional events and are not secondary or incidental to agriculture.
- The events are not Temporary Events under Restricted Nonagricultural Uses for LEA land under the Sonoma County Code of Ordinances.

- The requested Use Permit and zoning modification would “run with the land” and therefore should not be permitted.
- The building is a Material Breach of the Williamson Act, given its size and primary use as an event venue.

The grounds for our objection include, but are not limited to, those summarized in this letter. Protect San Antonio Valley reserves the right to submit additional objections and comments.

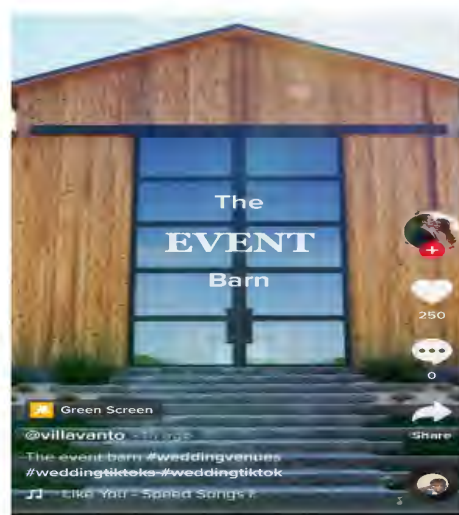
### Past Violations of County Regulations

As you may recall, a large new barn-shaped building was constructed on this Williamson Act property in 2021 under an Ag Exempt Permit. The owner signed an April 1, 2021 permit application and affidavit under penalty of perjury and wrote – in his own handwriting – that the building would be used for “farm machines, hay + grain.” This same sworn Ag Exempt Building Permit application also stipulated that the building would “not be used for human habitation or used by the public,” or even as a “place of employment where agricultural products are processed, treated or packaged.”

However, the building that the owners actually built is not designed to serve any agricultural purpose. The facility’s social media accounts refer to it as the “Event Barn,” or “Wedding Barn” in a group of buildings that make up the “Villa Vanto” Event Center. See Villa Vanto website ([www.villavanto.com](http://www.villavanto.com)), Instagram (<https://www.instagram.com/villavanto>), and TikTok (<https://www.tiktok.com/@villavanto>). Photos on these websites confirm that the Event Barn is a finished event space with multi-story picture windows, marble bathrooms, a “bridal suite,” and luxurious sitting areas (see sample photos attached to the end of this letter). The building is surrounded by newly-planted ornamental trees and elaborate landscaping. There is no sign of any hay, farm machines, or grain. This building is not an ag barn.

We also note that there is another large barn on the property that the owners recently remodeled with high-end finishes and luxury amenities similar to the Event Center. In their social media accounts, they call this building the “Groom Barn” (see attached sample photos). We have not been able to locate any permits for work done on the Groom Barn.

In the last few months, County inspectors have cited the Event Barn for a number of code violations, which to our knowledge remain unrectified. We do not know if there is any effort underway to address misstatements in the Ag Exempt Building Permit application, or to inspect the Groom Barn remodel.



### This is An Event Center Not a Lavender Farm

The applicants have now applied for a Use Permit and Zoning modifications to operate a “small scale agricultural processing operation and up to 28 special events annually to promote the farm’s products on a 56.76 acre parcel within a new 5,020 square foot agricultural building.” The applicants represent that this “new agricultural building” pictured above– the same Event Barn with the marble bathrooms – “will be used principally for small scale agricultural processing” of lavender oil from a two-acre lavender field (which does not yet exist).

Once planted, two acres of lavender would be expected to yield up to four gallons of lavender oil annually, with a maximum value of approximately \$7,200.<sup>1</sup> To market these products, the applicants have requested a Use Permit to host up to 28 weddings, corporate retreats, reunions, private parties and other events per year, with as many as 4,620 people in attendance. As noted above, the applicants represent that the purpose of these events is “to promote the farm’s products.”

The applicants’ website ([www.villavanto.com](http://www.villavanto.com)) is currently seeking bookings for Villa Vanto events, and the venue is also advertised on its own Instagram and TikTok social media accounts.<sup>2</sup> The uses described in these promotional materials lack any connection to agriculture and make no mention of lavender farming. The “Contact Us” page of the Villa Vanto website (see below) shows a pre-populated event budget of \$51,000. If you multiply 28 events per year times \$51,000 you get approximately \$1.43 million, which is over 95% of the applicants’ total projected annual revenue for the proposed project.

VILLA VANTO

Home Events About Us Gallery Contact Us

Please fill out this form and we will get back to you shortly

Enter Your Name \*

Enter Your Last Name \*

Enter Your Phone \*

Enter Your Email \*

Estimated Total Event Budget \*

\$51,000

Event type \*

Planner \*

How Did You Hear About Us? \*

Type Your Message Here \*

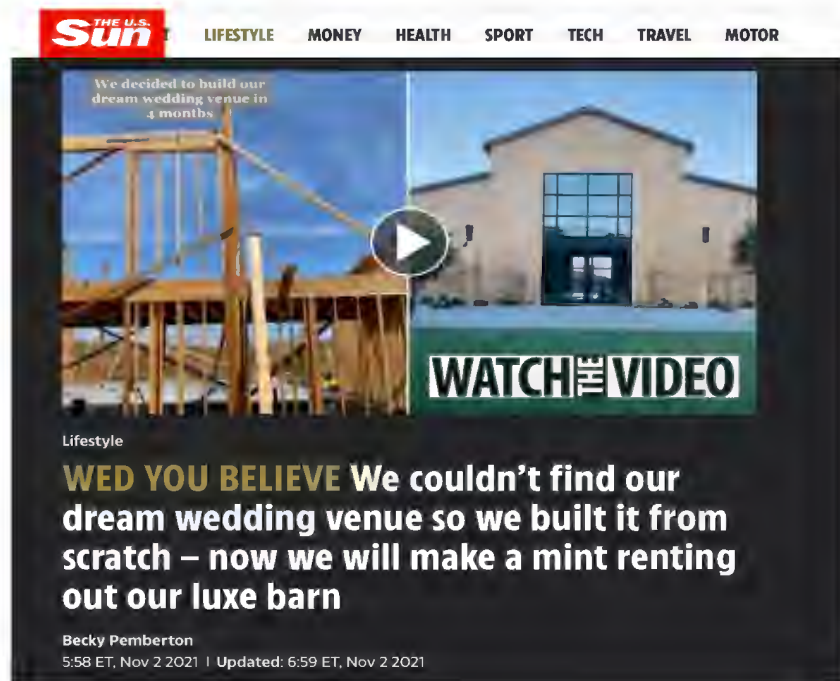
It is obvious that the applicants’ revenue projections are driven by event revenues centered on the Event Barn and Groom Barn, not efforts to promote lavender oil or other unidentified agricultural products.

Indeed, media reports confirm that the new facilities on this property were custom-built as a luxury wedding and event venue, and that the owners’ business now consists of renting it out to others. See

<sup>1</sup> A quick Google search shows that 1 acre of mature lavender yields approximately 2 gallons of lavender oil. You can buy a gallon of lavender oil on Amazon for \$292 (see <https://amzn.to/3L7nw9c>). The applicants represent that “premium” lavender oil sells for “approximately \$7.00 per ounce,” or \$896/gallon. Taking the applicants’ price, each harvest would generate about \$3,600 in gross revenue; the applicants claim they would have two harvests per year.

<sup>2</sup> Instagram (<https://www.instagram.com/villavanto>) and TikTok (<https://www.tiktok.com/@villavanto>).

Becky Pemberton, “Wed You Believe: We Couldn’t Find Our Dream Wedding Venue So We Built It From Scratch – Now We Will Make A Mint Renting Out Our Luxe Barn,” *The Sun*, November 2, 2021.<sup>3</sup>



The above article quotes the “savvy couple” as saying “We thought it was a better idea to make a business investment and rent our venue out after our wedding rather than renting out a venue for the day.”

Thus, the primary objective of this development has always been to create an Event Center, first for the applicants’ own wedding, then to rent it out for public use – the opposite of what has been represented to the County.

### **The County Should Deny the Requested Use Permit**

The applicants seek a Use Permit for “periodic promotional events.” They claim that these “[p]romotional events are planned to take place at the facility to educate customers about the farm’s premium products, their differentiation from comparable products on the market and about the farm’s sustainable agricultural operations.”

The following events are proposed:

- 15 Private Parties, Reunions, Weddings (80-200 attendees) – up to 3,000 guests per year
- 10 Customer, Educational, Marketing, Farm to Table Events (40 -120 attendees) – up to 1,200 guests per year
- 2 Charity Fundraising Events (50-150 attendees) – up to 300 guests per year
- 1 Industry related event (40-120 attendees) – up to 120 guests per year

<sup>3</sup> This article is available at <https://www.the-sun.com/lifestyle/3980096/couldnt-find-dream-wedding-venue-built-it-rent-it-out/>.



These requested uses of the Event Center directly conflict with the General Plan and the property's existing zoning under the LEA land use category. They also fail to qualify for any Allowed Land Use exception under LEA zoning.<sup>4</sup>

### The General Plan and LEA Designation

The purpose of the Sonoma County General Plan LEA land use category is to promote the agricultural uses and character of the designated land:

To enhance and protect lands best suited for permanent agricultural use and capable of relatively low production per acre of land; and to implement the provisions of the Land Extensive Agriculture land use category of the General Plan and the policies of the Agricultural Resources Element.

Article 06, Section 26-06-005. The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses.” Policy AR-4a (emphasis added).

In addition, the General Plan requires any visitor serving uses not just to be related to agriculture, but also limited and secondary to agricultural production:

GOAL AR-6: Allow new visitor serving uses and facilities in some agricultural areas but limit them in scale and location. These uses must be beneficial to the agricultural industry and farm operators and compatible with long term agricultural use of the land.

Objective AR-6.1: Give the highest priority in all agricultural land use categories to agricultural production activities. Visitor serving uses shall promote agriculture and enhance marketing of Sonoma County agricultural products, but shall be secondary and incidental to agricultural production.

(emphasis added.)

Furthermore, even when visitor serving uses are closely related to agriculture, they must still be denied if they would constitute a detrimental local concentration of such uses, such as where they would: (1) result in road access conflicts or excessive traffic; (2) draw from water resources needed for agriculture; or (3) be “detrimental to the rural character of the area.” Policy AR-6f.

### The Project Violates the General Plan and Applicable LEA Zoning

As is obvious from the photos of the Event Center, the “Villa Vanto” marketing and social media posts, news reports, and the Application itself, the primary purpose of the applicants’ project is to establish a luxury event venue that can be rented out for weddings, parties, and corporate retreats. These proposed visitor-serving uses violate the General Plan and LEA zoning regulations because they are not “secondary and incidental to agricultural production.”

Although the project has been packaged to create the veneer of an agricultural focus, any actual agricultural production and promotion is secondary to Villa Vanto’s main proposed use as an event venue. Making and selling four gallons a year of lavender oil do not magically convert the project’s “primary use” to agriculture. Common sense dictates that any lavender oil sales, processing, or farming education would

---

<sup>4</sup> In addition, it would violate the Williamson Act – see pp. 7-8 below.

be incidental to the events held at the venue, not the other way around – no one organizes weddings to facilitate lavender oil purchases, or to share ideas about sustainable farming. And as shown above, the expected income from sales of agricultural products is miniscule compared to the \$50,000 per event budget associated with renting out the venue. It would turn the General Plan on its head to view the proposed project as primarily an agricultural use.

#### The Project Does Not Qualify for Any Allowed Land Use Exception

The applicants claim that the “small scale agricultural processing area will be used to support Periodic Special Events, a use permitted in the LEA zone (subject to discretionary approval criteria) by the Sonoma County Code of Ordinances, Section 26-06-030- Allowed Land Uses, Table 6-1- Recreation, Education and Public Assembly Land Use Category.”

This is incorrect. The proposed uses are not allowed under this provision.

Section 26-22-120 defines a Periodic Special Event as “a periodic event such as a parade, concert, festival, race or gathering which attracts a large gathering of people either by direct participation, or as spectators.” A zoning permit is required for all Periodic Special Events held on LEA land. This is most often a per event zoning permit, because that is generally what is done as this is for events that occur infrequently. However, the applicants here appear to seek zoning permission that would permanently change the nature of the use of the land from an agricultural property to an event venue.

That should not be allowed. First, a Periodic Special Event would have to qualify as a “Temporary Event” under “Restricted Nonagricultural Uses,” Section 26-22-120 (E)(1)(r). The proposed use of this facility as an event venue is permanent, not temporary – that was the reason it was built. Second, Section 26-22-120 (E)(2) requires any Periodic Special Event use to be “consistent with General Plan Objectives AR-4.1 and policy AR-4a.” The proposed nonagricultural use of the Event Center by thousands of people a year would dominate the property, and impermissibly displace agricultural production from being the parcel’s highest priority use. And third, under Section 26-22-120 (D), any Periodic Special Events held on a Williamson Act property – like this parcel – must comply with the Williamson Act and related Sonoma County Rules. As shown below, they would not comply in any way, shape or form.

The above section makes clear that the General Plan and zoning code do not allow the proposed uses in an LEA property, nor should they. These extensive proposed non-agricultural uses conflict with the express purpose of those laws and regulations, and would degrade the rural character of the surrounding area. Accordingly, the project clearly violates the General Plan provisions and zoning regulations set forth above, and the use permit should be denied.

#### **Other Zoning Permit Requests**

The applicants make two related zoning permit requests: (1) to add a small-scale agricultural processing operation for the extraction of oil from lavender crops that will in the future be planted on the property; and (2) to open a retail store for the sale of agricultural products grown on the property.

We have no objection to adding the equipment needed to extract oil from the proposed future two-acre lavender field. (We note that the lavender oil distilling equipment listed on the application appears to occupy a footprint of about 100 square feet, or about 2% of the square footage of the Event Barn.) And based on what we know now, we also would not object to adding limited retail sales on the property, provided that they are confined to sales of the ranch-grown lavender oil. We would object to a retail

facility with a broader scope than this, however, as a general retail operation would directly conflict with the rural nature of this unincorporated area.

### **Williamson Act Violations**

According to Permit Sonoma property records, this property was placed in a Williamson Act land contract in July of 2002. The Williamson Act is intended to protect and preserve agricultural land, prime soils, and open space. It provides significant property tax reductions, thereby lowering the costs of agricultural operations and open space preservation for property owners.

With respect to the Williamson Act, the applicant states as follows:

Under Uniform Rule 8.3, H, 1, conducting promotional special events directly related to agricultural education, the promotion and sale of agricultural commodities produced on the contracted land are compatible with agricultural uses permitted on this land. The proposed events meet the qualifying criteria for compatibility with agricultural uses and last no longer than two consecutive days and do not provide overnight accommodation. The agricultural building incidentally supports the events and its primary function is for processing and sale of crop products.

However, Section 8.3(H) of the Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zones (SCUR) prohibits the proposed uses. First, it allows only events that are “directly related to agricultural education or the promotion or sale of agricultural commodities and products produced on the contracted land.” As noted above, the applicants’ proposed events – such as weddings, corporate retreats, and family reunions – have no connection whatsoever to agriculture. Therefore, they are prohibited.

Second, even if such weddings and other events were allowed on the property, the Williamson Act prohibits the construction or maintenance of a permanent structure “dedicated to the events” on the contracted land. See SCUR Section 8(H)(1)(b). That is exactly what the project’s “Event Barn” is and always has been, so it is not allowed.

Third, SCUR Section 8.2(B)(8) mandates that “the use will not significantly change the character, appearance, or operation of the agricultural or open space uses of the contracted land.” Adding a luxury wedding and event venue for thousands of people in the middle of a 56-acre cattle ranch in rural unincorporated Petaluma is a significant change of use that would violate the Rules.

Finally, we believe that the applicants’ 2021 construction of their 5,000 square foot Event Barn constitutes a material breach of the Williamson Act. Section 51250 of the California Government Code defines a “material breach” of a Williamson Act contract as follows:

*(b) For purposes of this section, a breach is material if, on a parcel under contract, both of the following conditions are met:*

*A commercial, industrial, or residential building is constructed that is not allowed by this chapter or the contract, local uniform rules or ordinances consistent with the provisions of this chapter, and that is not related to an agricultural use or compatible use.*

*(2) The total area of all of the building or buildings likely causing the breach exceeds 2,500 square feet for either of the following:*

*(A) All property subject to any contract or all contiguous property subject to a contract or contracts owned by the same landowner or landowners on January 1, 2004.*

The above material breach provisions clearly apply because the Event Barn exceeds 2,500 square feet, and is not related to an agricultural use or compatible use. Section 51250 sets out the procedures a county should follow in notifying the owner of a material breach, and the subsequent steps that are required. If not already underway, this process should begin immediately.

## **Conclusion**

Anyone reading the applicants' use and zoning permit applications would have good reason to be skeptical. Who uses a 5,000 square foot building to "process" four gallons of lavender oil with a compact still? Or hosts weddings whose "primary function" is to promote agricultural products? But the applicants' track record here – building an "Ag Exempt" structure with extravagant finishes and amenities, aggressively promoting a luxury Event Center on Williamson Act land – strongly indicates that they lack any serious intent to respect the agricultural laws and regulations that actually apply to this property.

Less than a year ago, the owner claimed that he was building a barn to store "farm equipment, hay + grain" in his original sworn Ag Exempt permit application, and the County accepted those representations. The applicants' latest representations – that the planned weddings and events are "incidental" to the building's supposed "primary function [of] processing and sale of crop products" – are contradicted by their own public statements and marketing materials, as well as common sense. There is no basis for the County to accept them. The County should deny the Use Permit Application and pursue enforcement for the applicants' existing code and Williamson Act violations.

Very truly yours,

Protect San Antonio Valley

Kathleen Lavigna - 1250 San Antonio Road, Petaluma  
William Byrne - 1250 San Antonio Road, Petaluma  
Michael Mayo - 1000 Longhorn Lane, Petaluma  
Guillermo Duran - 1000 Longhorn Lane, Petaluma  
Deirdre Hockett - 1255 San Antonio Road, Petaluma  
Chris Hockett – 1255 San Antonio Road, Petaluma  
Tom Gawronski – 2000 Longhorn Lane Petaluma  
Anne DeChelbor - 2000 Longhorn Lane Petaluma  
Elizabeth Carpenter - 1205 San Antonio Road, Petaluma  
Mark Carpenter - 1205 San Antonio Road, Petaluma  
Lacey Lavigna - 911 B Street, Petaluma  
Adam Lavigna - 413 Black Oak, Petaluma  
Stefanie Lavigna - 413 Black Oak, Petaluma  
Cara Marchando - 1275 San Antonio Road

(Additional signatures will be submitted separately)

# Sample “Villa Vanto” Photos

From Villa Vanto Website, Instagram and Tik Tok Pages

4485 D Street Ext.  
Petaluma

# Villa Vanto Website

## Home page on March 25, 2022



VILLA VANTO

[Home](#)

[Events](#)

[About Us](#)

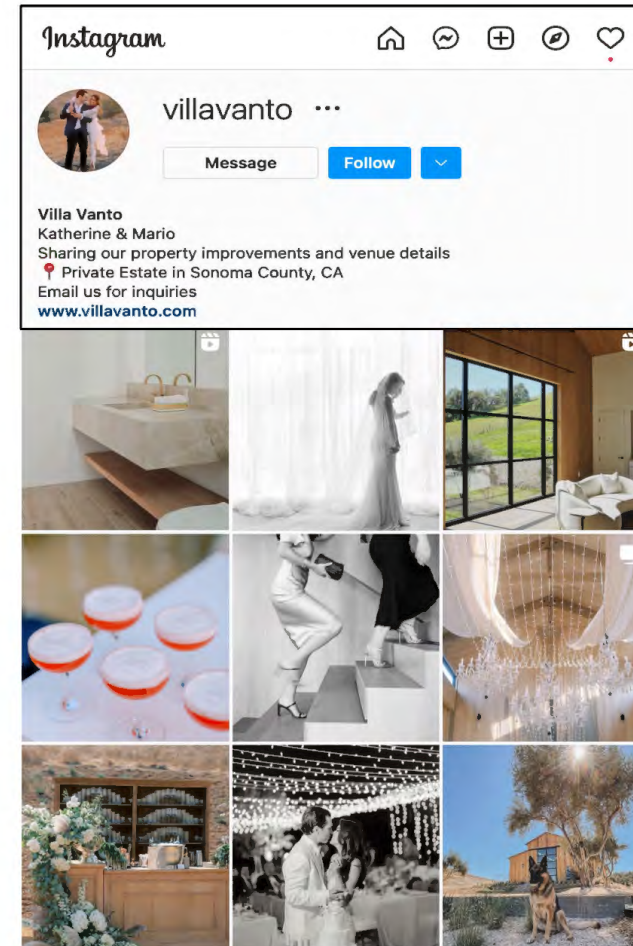
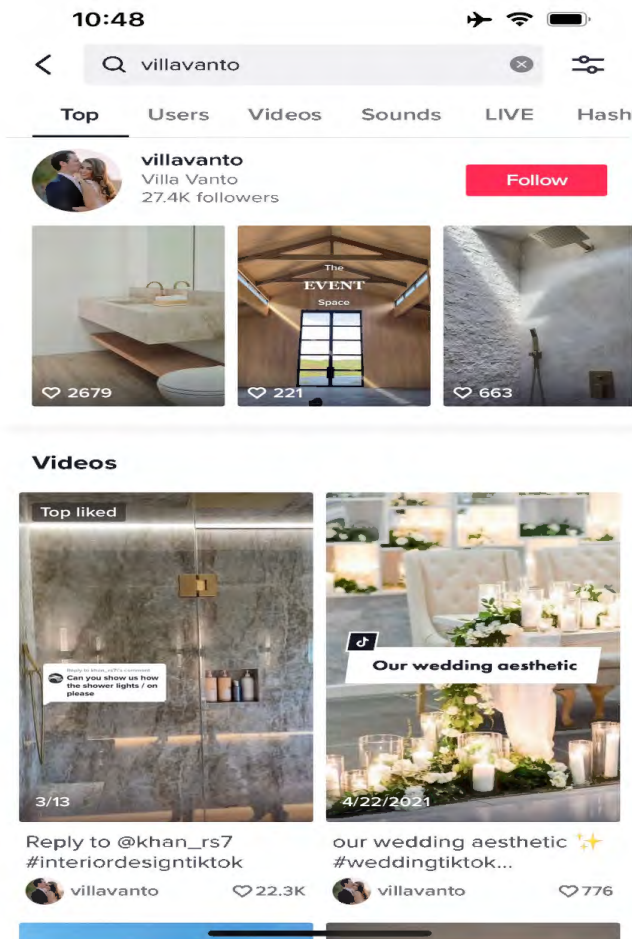
[Gallery](#)

[Contact Us](#)

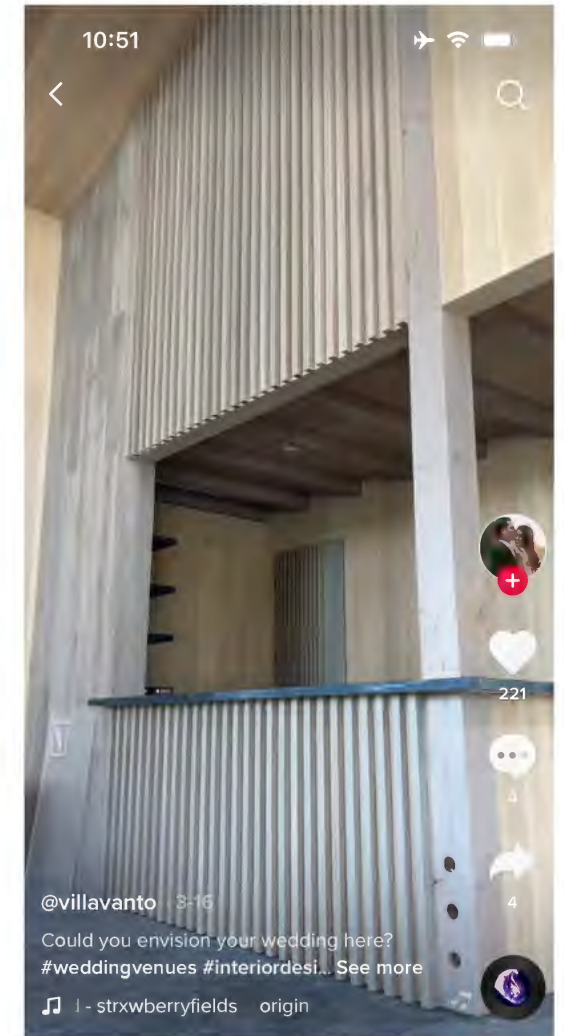
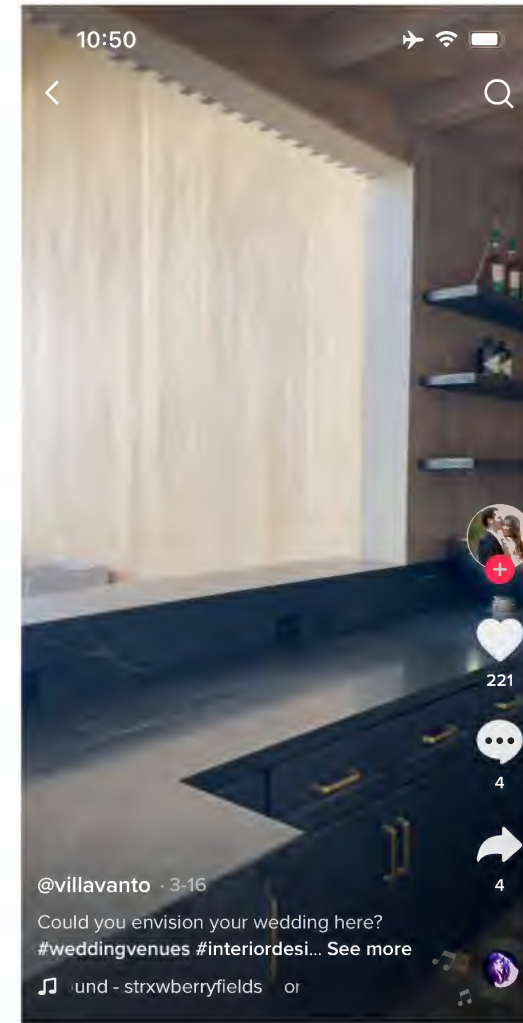
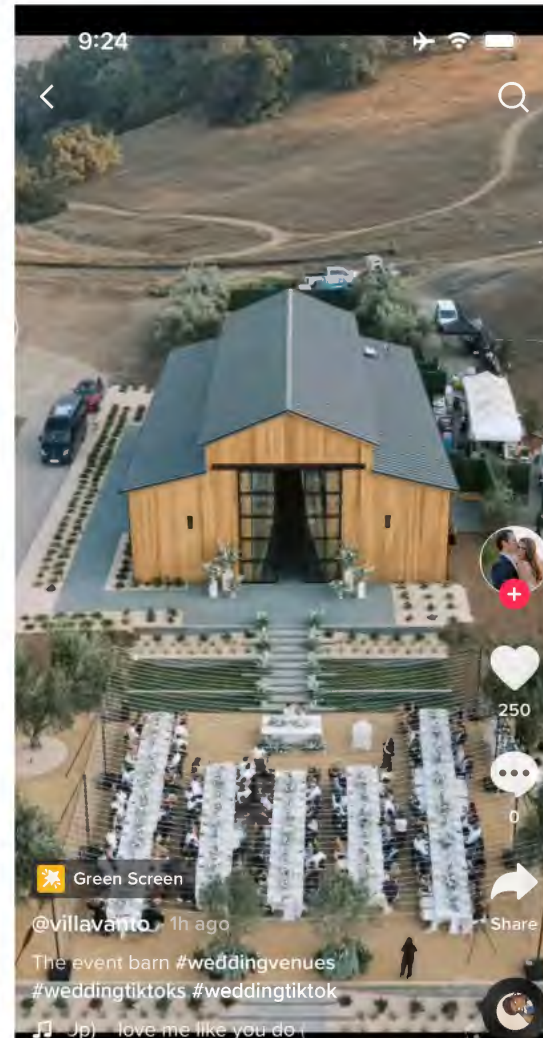
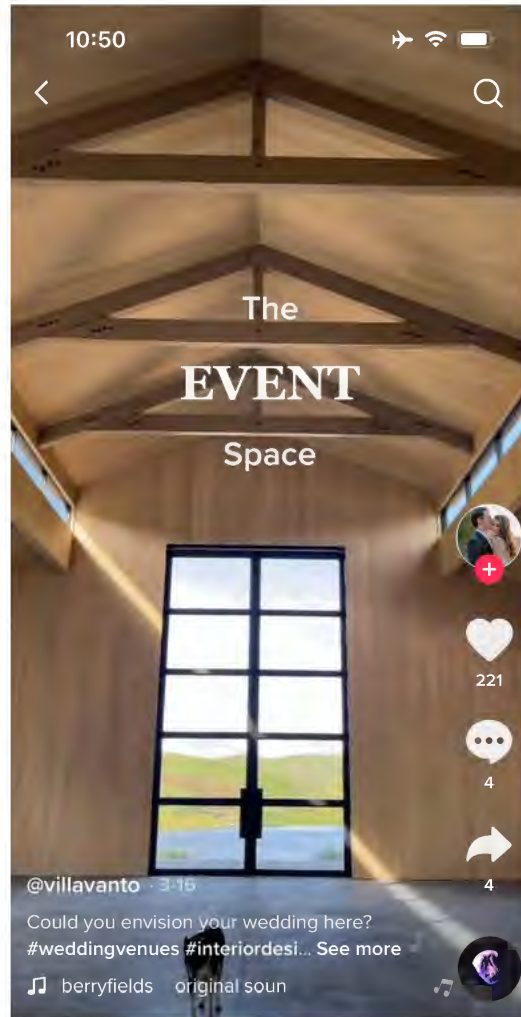




# Tik Tok and Instagram Pages for Villa Vanto on March 25, 2022

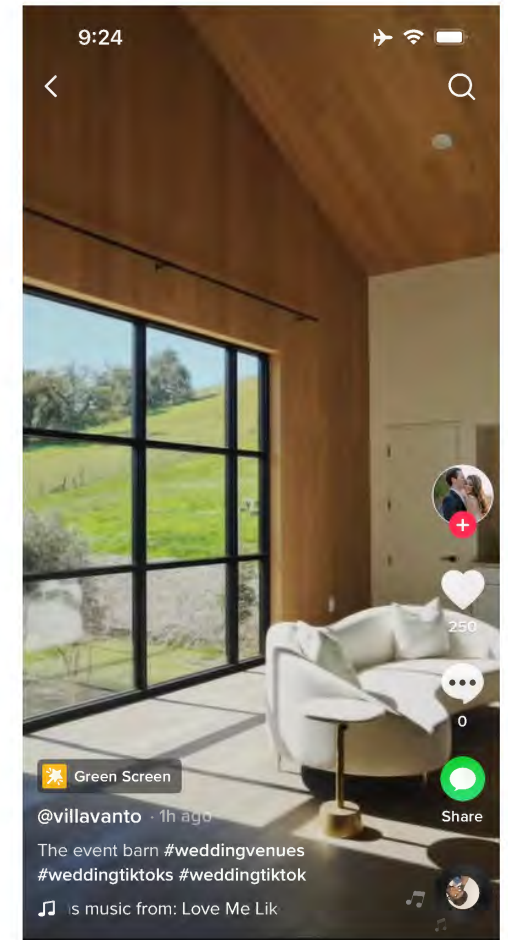
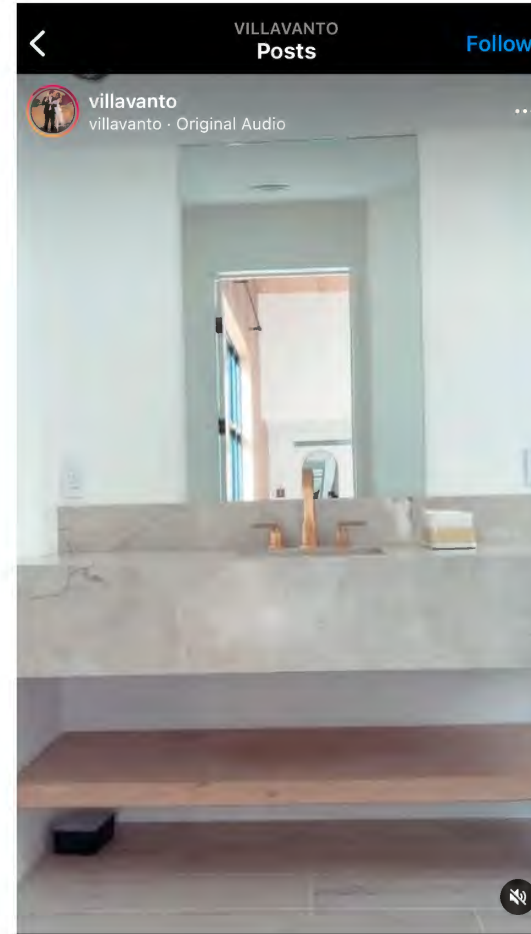
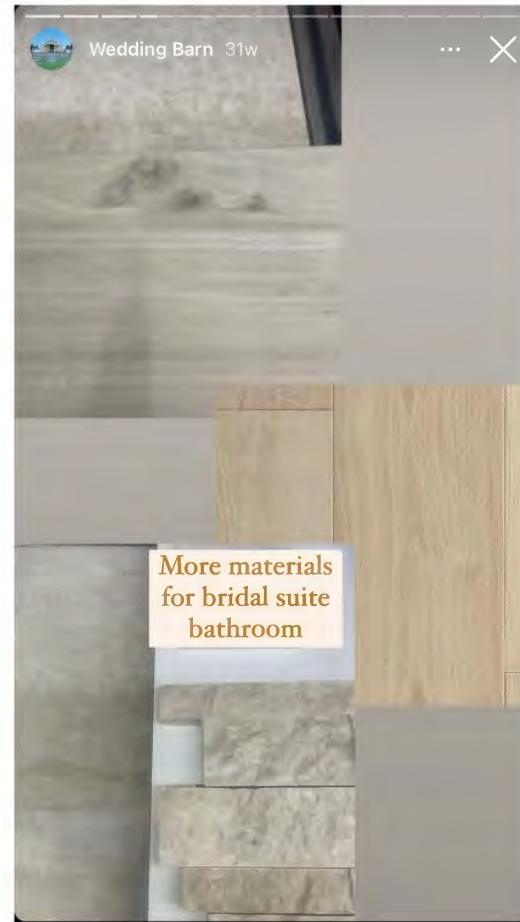


# Event Barn – interior and exterior spaces





# Bridal Suite in Event Barn



# “Groom Barn”





Mario and Katherine Ghilotti  
4485 D Street  
Petaluma, CA 94952

June 7, 2024

Re: Ghilotti Project at APN 020-130-037; Use Permit Application UPE21-0064

Dear Mario and Katherine,

Thank you for the letter dated May 5, 2024, which we received, along with information about the proposed development at Villa Vanto, via hand delivery in our mailboxes over the Memorial Day weekend.

You do not refer to a Use Permit Application number in your letter, so we assume that the materials you delivered relate to the original permit application referred to above.

As you know we objected to your use permit application in our letter dated March 28, 2022 to Permit Sonoma and other County officials. Another copy of our letter is attached for your convenience.

While the promotional materials you distributed frame the project differently, our objections remain, as the scope and purpose of the project do not appear to have been modified in a new use permit application.

If you have revised your use permit application, please provide us with a copy. If you are planning to revise the application, we would like to know how you would go about addressing the objections we raised in our previous letter.

Very truly yours,

Protect San Antonio Valley

cc (w/enclosure): Original recipients of March 28, 2022 letter





August 5, 2024

David Rabbitt  
Supervisor  
Sonoma County, District 2  
[David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)

Tennis Wick  
Permit Sonoma Director  
[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)

Tyra Harrington  
Code Enforcement Manager  
[Tyra.Harrington@sonoma-county.org](mailto:Tyra.Harrington@sonoma-county.org)

Hannah Spencer  
Supervising Planner  
[Hannah.Spencer@sonoma-county.org](mailto:Hannah.Spencer@sonoma-county.org)

Joshua Miranda  
Project Planner  
[Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org)

RE: Project at APN 020-130-037; Permit Application UPE21-0064 and  
BLD21-8704, Permit Sonoma File # PLP24-0012

Dear Mr. Rabbitt, Mr. Wick, Ms. Harrington, Ms. Spencer and Mr. Miranda,

Abraham Lincoln once asked an audience how many legs a dog has if you counted the tail as a leg. When they answered 'five,' Lincoln told them that the answer was four – calling the tail a leg didn't make it a leg.

The applicants here are asking a version of Lincoln's question: How many Event Centers would you have if you called an Event Center a lavender processing facility? The answer, of course, is one. And operating an Event Center on this property is not allowed.



August 5, 2024

## Background

We previously addressed this project in our letter of March 28, 2022, to which we refer you.<sup>1</sup> In sum, in the spring and summer of 2021, in violation of the Williamson Act, the General Plan, applicable zoning requirements, and numerous building codes, the applicants constructed a 5,000 square foot, custom-designed luxury Event Center. The applicants' April, 11, 2021 permit application stated that the building would be an Ag Exempt "wood framed pole barn" for storing "farm machines, hay and grain." There was no mention of lavender.

The facility they built – immediately after receiving the Ag Exempt barn permit – is specifically unsuited for agricultural use. It is instead a dedicated event venue with unpermitted electrical, plumbing, and many other high-end improvements custom-designed for non-agricultural uses – e.g., marble counters, multi-story glass windows, a bridal suite and salon with a bank of make-up mirrors, and men's and women's restrooms with multiple toilets. The grounds around it are landscaped as party spaces, with decorative olive trees and artificial grass. It was extensively advertised as an event venue on the applicants' websites, and that is also what they told the press it was. There was no farm equipment or livestock feed in it. Or lavender.

After we submitted our March 2022 letter, Permit Sonoma cited the applicants for the following violations:

- "Advertising and operating an event center on a parcel included under the Williamson Act" (VPL22-0111).
- Unpermitted improvements, including electrical, plumbing, windows, and other building code violations (VBU21-0642 and VBU21-0581).
- Unpermitted grading violations (VGR21-0060).
- Unpermitted remodel and occupancy of another barn as a "wedding groom preparation area" (VBU22-0129).

## Objections

We incorporate by reference the same objections that we asserted in our March 28, 2022 letter, and add the following brief points:

We would first like to reiterate that we have no objection to applicants' plans to someday grow lavender on their property, or to engage in limited retail sales of lavender products. Nor would we object to the applicants restoring the cattle that used to graze on this land until recently.

---

<sup>1</sup> A copy of our 3/28/22 letter is included for your convenience.

August 5, 2024

However, using their new building for dozens of weddings and other large special events for thousands of people is not primarily a “sales channel” for the (currently non-existent) lavender products grown on the farm. As Permit Sonoma has already recognized, the building is an Event Center (VPL22-0111). It was specially designed and constructed to host large events. That is why it has all the features of a deluxe event venue. That is why the applicants told the public and press that it was a deluxe event venue.<sup>2</sup>

Just like Lincoln’s dog, calling the building something else does not transform it into something else. Nor does sticking in lavender stills (which only take up 100 square feet each). Nor does claiming that the remainder of the building is needed to accommodate thousands of pounds of lavender sacks awaiting eager buyers – who also happen to be attending a wedding celebration? Really now.

This building was never needed for any actual agricultural reason. We note that there was at least one existing agricultural barn on site that could have served such a purpose, but it was converted by applicants – again without permits – into a deluxe “wedding groom preparation area” (VBU22-0129). Simply put, the idea that this event venue was designed and built primarily to serve agricultural needs lacks any factual basis, and should not be accepted.

We note that there are numerous inconsistencies in the use permit application and the other materials submitted in connection with the project by the applicants and their counsel.<sup>3</sup> Will it be 2 acres of lavender (use permit), or 10 acres of lavender (lawyers’ letter p.5, and brochure given to neighbors)? And will the applicants import 15 more acres of lavender grown somewhere else (lawyers’ letter p.5)? Will there be 28 large events per year (use permit), or 25 “lavender immersive experiences” (neighbor brochure)? We reserve the right to comment on these items later once they are clarified.

As we said in our March 2022 letter, we believe that constructing a permanent, dedicated 5,000 square foot Event Center on this land was a material violation of the Williamson Act. The proposed events also violate Williamson Act use restrictions, because, among other things, (1) they are not directly related to agricultural education or the promotion or sale of the products grown on site; and (2) they would “significantly change the character, appearance or operation” of this rural agricultural land. Examples of the latter include parking 150 cars per event on dry grass, and consuming 3 times as much water on decorative landscaping for the Event Center as would be used for 6 acres of lavender farming (see Use Permit Application and 3/15/23 Hydrogeologic Report at p. 6).

---

<sup>2</sup> [“Wed You Believe: We Couldn’t Find Our Dream Wedding Venue So We Built It From Scratch – Now We Will Make A Mint Renting Out Our Luxe Barn,”](#) The Sun, November 2, 2021.

<sup>3</sup> See April 29, 2022 letter from Riley F. Hurd III.

August 5, 2024

The applicants appear to acknowledge their Williamson Act violations, hoping that the County will absolve them by retroactively issuing a building permit and use permit.<sup>4</sup> For the reasons we have noted, we do not believe it would be appropriate to grant these requests.

### Precedent

From the beginning of this project, the applicants have displayed a lack of regard for the laws, regulations and codes that apply to their land and project. They bought the property with knowledge that they were not allowed to build and operate an Event Center. Yet they went forward and custom-designed, built, and advertised a very fancy one. They now ask those responsible for enforcing the rules to waive them. All based on the fiction that their dedicated Event Center is actually a lavender processing facility.

It is hard to imagine catching anyone more red-handed in violating the rules that the rest of Sonoma County ranchers, farmers, and citizens are expected to abide by. Granting the requested permits would show all those people that the rules don't really mean what they say – and also that they don't apply to everybody. That would set a deeply unhealthy precedent.

This is a problem that applicants knowingly created for themselves. It is not the responsibility of Permit Sonoma, the Board of Zoning Adjustments, or the taxpayers of Sonoma County, to bail them out of it.

We respectfully oppose the requested permits.

Very truly yours,

Protect San Antonio Valley

Encl.: 3/28/22 Letter and attachments

---

<sup>4</sup> See April 29, 2022 letter from Riley F. Hurd III, p. 4.



David Rabbitt  
Board of Supervisors  
County of Sonoma  
575 Administration Drive  
Room 100 A  
Santa Rosa, CA 95403

Pat Gilardi  
Larry Reed  
Commissioners  
2nd Supervisorial District  
Planning Commission  
and Board of Zoning Adjustments

Tennis Wick  
Permit Sonoma Director  
  
Tyra Harrington  
Code Enforcement Manager  
Code Enforcement

Mark Franceschi  
Code Enforcement  
Supervisor  
Code Enforcement

Eduardo Hernandez  
Planner III  
Planning Project Review  
  
County of Sonoma  
2550 Ventura Avenue,  
Santa Rosa, CA 95403

March 28, 2022

Re: Ghilotti Project at APN 020-130-037; Use Permit Application UPE21-0064

Dear Mr. Rabbitt, Ms. Gilardi, Mr. Reed, Mr. Wick, Ms. Harrington, Mr. Franceschi, and Mr. Hernandez,

We are writing to express our opposition to the extensive development at 4485 D Street Extension in Petaluma, and the Use Permit Application (UPE21-0064) recently submitted for this property. While we appreciate the County's enforcement actions to date, they appear to have made little to no difference in how the applicants are developing and using the project. As described below, the developers of this site continue to disregard and abuse State and County laws, zoning regulations, and building codes.

Our objections are based on the following:

- The applicants' 5,000 square foot barn, constructed under an Ag Exempt permit in 2021 and later cited by Permit Sonoma for multiple code violations, is being used as an Event Center ([www.villavanto.com](http://www.villavanto.com)).
- The proposed uses of the Event Center, including 28 events – weddings, corporate events, and fundraisers – for up to 4,600 attendees annually, do not comply with LEA zoning under the Sonoma County General Plan LEA land use category. They are not agricultural promotional events and are not secondary or incidental to agriculture.
- The events are not Temporary Events under Restricted Nonagricultural Uses for LEA land under the Sonoma County Code of Ordinances.

- The requested Use Permit and zoning modification would “run with the land” and therefore should not be permitted.
- The building is a Material Breach of the Williamson Act, given its size and primary use as an event venue.

The grounds for our objection include, but are not limited to, those summarized in this letter. Protect San Antonio Valley reserves the right to submit additional objections and comments.

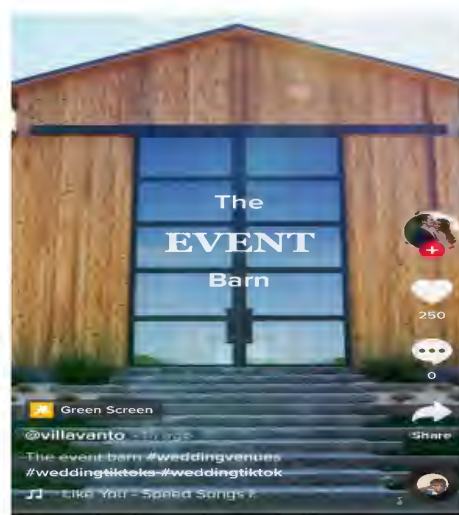
### Past Violations of County Regulations

As you may recall, a large new barn-shaped building was constructed on this Williamson Act property in 2021 under an Ag Exempt Permit. The owner signed an April 1, 2021 permit application and affidavit under penalty of perjury and wrote – in his own handwriting – that the building would be used for “farm machines, hay + grain.” This same sworn Ag Exempt Building Permit application also stipulated that the building would “not be used for human habitation or used by the public,” or even as a “place of employment where agricultural products are processed, treated or packaged.”

However, the building that the owners actually built is not designed to serve any agricultural purpose. The facility’s social media accounts refer to it as the “Event Barn,” or “Wedding Barn” in a group of buildings that make up the “Villa Vanto” Event Center. See Villa Vanto website ([www.villavanto.com](http://www.villavanto.com)), Instagram (<https://www.instagram.com/villavanto>), and TikTok (<https://www.tiktok.com/@villavanto>). Photos on these websites confirm that the Event Barn is a finished event space with multi-story picture windows, marble bathrooms, a “bridal suite,” and luxurious sitting areas (see sample photos attached to the end of this letter). The building is surrounded by newly-planted ornamental trees and elaborate landscaping. There is no sign of any hay, farm machines, or grain. This building is not an ag barn.

We also note that there is another large barn on the property that the owners recently remodeled with high-end finishes and luxury amenities similar to the Event Center. In their social media accounts, they call this building the “Groom Barn” (see attached sample photos). We have not been able to locate any permits for work done on the Groom Barn.

In the last few months, County inspectors have cited the Event Barn for a number of code violations, which to our knowledge remain unrectified. We do not know if there is any effort underway to address misstatements in the Ag Exempt Building Permit application, or to inspect the Groom Barn remodel.



### This is An Event Center Not a Lavender Farm

The applicants have now applied for a Use Permit and Zoning modifications to operate a “small scale agricultural processing operation and up to 28 special events annually to promote the farm’s products on a 56.76 acre parcel within a new 5,020 square foot agricultural building.” The applicants represent that this “new agricultural building” pictured above– the same Event Barn with the marble bathrooms – “will be used principally for small scale agricultural processing” of lavender oil from a two-acre lavender field (which does not yet exist).

Once planted, two acres of lavender would be expected to yield up to four gallons of lavender oil annually, with a maximum value of approximately \$7,200.<sup>1</sup> To market these products, the applicants have requested a Use Permit to host up to 28 weddings, corporate retreats, reunions, private parties and other events per year, with as many as 4,620 people in attendance. As noted above, the applicants represent that the purpose of these events is “to promote the farm’s products.”

The applicants’ website ([www.villavanto.com](http://www.villavanto.com)) is currently seeking bookings for Villa Vanto events, and the venue is also advertised on its own Instagram and TikTok social media accounts.<sup>2</sup> The uses described in these promotional materials lack any connection to agriculture and make no mention of lavender farming. The “Contact Us” page of the Villa Vanto website (see below) shows a pre-populated event budget of \$51,000. If you multiply 28 events per year times \$51,000 you get approximately \$1.43 million, which is over 95% of the applicants’ total projected annual revenue for the proposed project.

VILLA VANTO

Home Events About Us Gallery Contact Us

Please fill out this form and we will get back to you shortly

Enter Your Name \*

Enter Your Last Name \*

Enter Your Phone \*

Enter Your Email \*

Estimated Total Event Budget \*

\$51,000

Event type \*

Planner \*

How Did You Hear About Us? \*

Type Your Message Here \*

It is obvious that the applicants’ revenue projections are driven by event revenues centered on the Event Barn and Groom Barn, not efforts to promote lavender oil or other unidentified agricultural products.

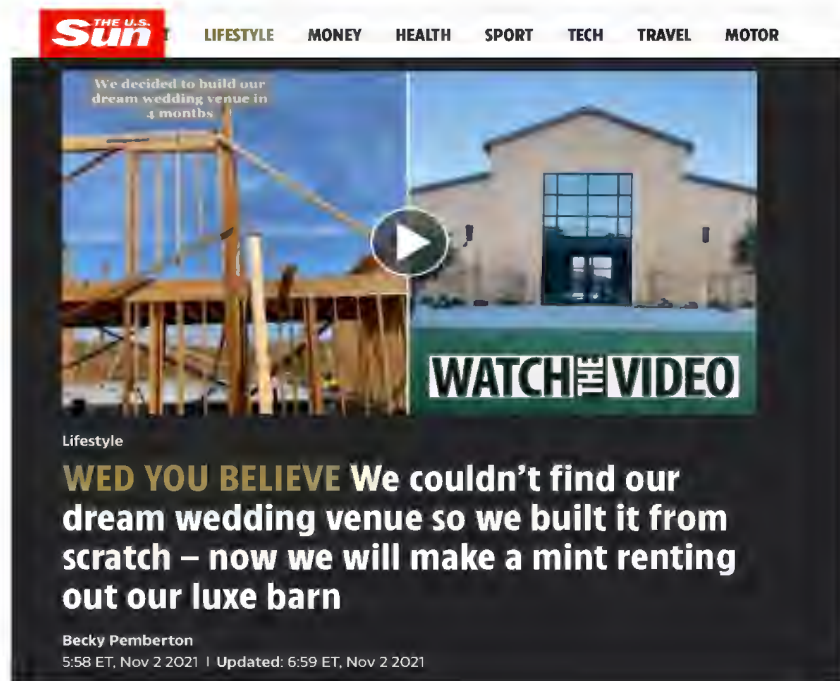
Indeed, media reports confirm that the new facilities on this property were custom-built as a luxury wedding and event venue, and that the owners’ business now consists of renting it out to others. See

<sup>1</sup> A quick Google search shows that 1 acre of mature lavender yields approximately 2 gallons of lavender oil. You can buy a gallon of lavender oil on Amazon for \$292 (see <https://amzn.to/3L7nw9c>). The applicants represent that “premium” lavender oil sells for “approximately \$7.00 per ounce,” or \$896/gallon. Taking the applicants’ price, each harvest would generate about \$3,600 in gross revenue; the applicants claim they would have two harvests per year.

<sup>2</sup> Instagram (<https://www.instagram.com/villavanto>) and TikTok (<https://www.tiktok.com/@villavanto>).



Becky Pemberton, “Wed You Believe: We Couldn’t Find Our Dream Wedding Venue So We Built It From Scratch – Now We Will Make A Mint Renting Out Our Luxe Barn,” *The Sun*, November 2, 2021.<sup>3</sup>



The above article quotes the “savvy couple” as saying “We thought it was a better idea to make a business investment and rent our venue out after our wedding rather than renting out a venue for the day.”

Thus, the primary objective of this development has always been to create an Event Center, first for the applicants’ own wedding, then to rent it out for public use – the opposite of what has been represented to the County.

### **The County Should Deny the Requested Use Permit**

The applicants seek a Use Permit for “periodic promotional events.” They claim that these “[p]romotional events are planned to take place at the facility to educate customers about the farm’s premium products, their differentiation from comparable products on the market and about the farm’s sustainable agricultural operations.”

The following events are proposed:

- 15 Private Parties, Reunions, Weddings (80-200 attendees) – up to 3,000 guests per year
- 10 Customer, Educational, Marketing, Farm to Table Events (40 -120 attendees) – up to 1,200 guests per year
- 2 Charity Fundraising Events (50-150 attendees) – up to 300 guests per year
- 1 Industry related event (40-120 attendees) – up to 120 guests per year

<sup>3</sup> This article is available at <https://www.the-sun.com/lifestyle/3980096/couldnt-find-dream-wedding-venue-built-it-rent-it-out/>.

These requested uses of the Event Center directly conflict with the General Plan and the property's existing zoning under the LEA land use category. They also fail to qualify for any Allowed Land Use exception under LEA zoning.<sup>4</sup>

### The General Plan and LEA Designation

The purpose of the Sonoma County General Plan LEA land use category is to promote the agricultural uses and character of the designated land:

To enhance and protect lands best suited for permanent agricultural use and capable of relatively low production per acre of land; and to implement the provisions of the Land Extensive Agriculture land use category of the General Plan and the policies of the Agricultural Resources Element.

Article 06, Section 26-06-005. The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses.” Policy AR-4a (emphasis added).

In addition, the General Plan requires any visitor serving uses not just to be related to agriculture, but also limited and secondary to agricultural production:

GOAL AR-6: Allow new visitor serving uses and facilities in some agricultural areas but limit them in scale and location. These uses must be beneficial to the agricultural industry and farm operators and compatible with long term agricultural use of the land.

Objective AR-6.1: Give the highest priority in all agricultural land use categories to agricultural production activities. Visitor serving uses shall promote agriculture and enhance marketing of Sonoma County agricultural products, but shall be secondary and incidental to agricultural production.

(emphasis added.)

Furthermore, even when visitor serving uses are closely related to agriculture, they must still be denied if they would constitute a detrimental local concentration of such uses, such as where they would: (1) result in road access conflicts or excessive traffic; (2) draw from water resources needed for agriculture; or (3) be “detrimental to the rural character of the area.” Policy AR-6f.

### The Project Violates the General Plan and Applicable LEA Zoning

As is obvious from the photos of the Event Center, the “Villa Vanto” marketing and social media posts, news reports, and the Application itself, the primary purpose of the applicants’ project is to establish a luxury event venue that can be rented out for weddings, parties, and corporate retreats. These proposed visitor-serving uses violate the General Plan and LEA zoning regulations because they are not “secondary and incidental to agricultural production.”

Although the project has been packaged to create the veneer of an agricultural focus, any actual agricultural production and promotion is secondary to Villa Vanto’s main proposed use as an event venue. Making and selling four gallons a year of lavender oil do not magically convert the project’s “primary use” to agriculture. Common sense dictates that any lavender oil sales, processing, or farming education would

---

<sup>4</sup> In addition, it would violate the Williamson Act – see pp. 7-8 below.

be incidental to the events held at the venue, not the other way around – no one organizes weddings to facilitate lavender oil purchases, or to share ideas about sustainable farming. And as shown above, the expected income from sales of agricultural products is miniscule compared to the \$50,000 per event budget associated with renting out the venue. It would turn the General Plan on its head to view the proposed project as primarily an agricultural use.

#### The Project Does Not Qualify for Any Allowed Land Use Exception

The applicants claim that the “small scale agricultural processing area will be used to support Periodic Special Events, a use permitted in the LEA zone (subject to discretionary approval criteria) by the Sonoma County Code of Ordinances, Section 26-06-030- Allowed Land Uses, Table 6-1- Recreation, Education and Public Assembly Land Use Category.”

This is incorrect. The proposed uses are not allowed under this provision.

Section 26-22-120 defines a Periodic Special Event as “a periodic event such as a parade, concert, festival, race or gathering which attracts a large gathering of people either by direct participation, or as spectators.” A zoning permit is required for all Periodic Special Events held on LEA land. This is most often a per event zoning permit, because that is generally what is done as this is for events that occur infrequently. However, the applicants here appear to seek zoning permission that would permanently change the nature of the use of the land from an agricultural property to an event venue.

That should not be allowed. First, a Periodic Special Event would have to qualify as a “Temporary Event” under “Restricted Nonagricultural Uses,” Section 26-22-120 (E)(1)(r). The proposed use of this facility as an event venue is permanent, not temporary – that was the reason it was built. Second, Section 26-22-120 (E)(2) requires any Periodic Special Event use to be “consistent with General Plan Objectives AR-4.1 and policy AR-4a.” The proposed nonagricultural use of the Event Center by thousands of people a year would dominate the property, and impermissibly displace agricultural production from being the parcel’s highest priority use. And third, under Section 26-22-120 (D), any Periodic Special Events held on a Williamson Act property – like this parcel – must comply with the Williamson Act and related Sonoma County Rules. As shown below, they would not comply in any way, shape or form.

The above section makes clear that the General Plan and zoning code do not allow the proposed uses in an LEA property, nor should they. These extensive proposed non-agricultural uses conflict with the express purpose of those laws and regulations, and would degrade the rural character of the surrounding area. Accordingly, the project clearly violates the General Plan provisions and zoning regulations set forth above, and the use permit should be denied.

#### **Other Zoning Permit Requests**

The applicants make two related zoning permit requests: (1) to add a small-scale agricultural processing operation for the extraction of oil from lavender crops that will in the future be planted on the property; and (2) to open a retail store for the sale of agricultural products grown on the property.

We have no objection to adding the equipment needed to extract oil from the proposed future two-acre lavender field. (We note that the lavender oil distilling equipment listed on the application appears to occupy a footprint of about 100 square feet, or about 2% of the square footage of the Event Barn.) And based on what we know now, we also would not object to adding limited retail sales on the property, provided that they are confined to sales of the ranch-grown lavender oil. We would object to a retail

facility with a broader scope than this, however, as a general retail operation would directly conflict with the rural nature of this unincorporated area.

### **Williamson Act Violations**

According to Permit Sonoma property records, this property was placed in a Williamson Act land contract in July of 2002. The Williamson Act is intended to protect and preserve agricultural land, prime soils, and open space. It provides significant property tax reductions, thereby lowering the costs of agricultural operations and open space preservation for property owners.

With respect to the Williamson Act, the applicant states as follows:

Under Uniform Rule 8.3, H, 1, conducting promotional special events directly related to agricultural education, the promotion and sale of agricultural commodities produced on the contracted land are compatible with agricultural uses permitted on this land. The proposed events meet the qualifying criteria for compatibility with agricultural uses and last no longer than two consecutive days and do not provide overnight accommodation. The agricultural building incidentally supports the events and its primary function is for processing and sale of crop products.

However, Section 8.3(H) of the Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zones (SCUR) prohibits the proposed uses. First, it allows only events that are “directly related to agricultural education or the promotion or sale of agricultural commodities and products produced on the contracted land.” As noted above, the applicants’ proposed events – such as weddings, corporate retreats, and family reunions – have no connection whatsoever to agriculture. Therefore, they are prohibited.

Second, even if such weddings and other events were allowed on the property, the Williamson Act prohibits the construction or maintenance of a permanent structure “dedicated to the events” on the contracted land. See SCUR Section 8(H)(1)(b). That is exactly what the project’s “Event Barn” is and always has been, so it is not allowed.

Third, SCUR Section 8.2(B)(8) mandates that “the use will not significantly change the character, appearance, or operation of the agricultural or open space uses of the contracted land.” Adding a luxury wedding and event venue for thousands of people in the middle of a 56-acre cattle ranch in rural unincorporated Petaluma is a significant change of use that would violate the Rules.

Finally, we believe that the applicants’ 2021 construction of their 5,000 square foot Event Barn constitutes a material breach of the Williamson Act. Section 51250 of the California Government Code defines a “material breach” of a Williamson Act contract as follows:

*(b) For purposes of this section, a breach is material if, on a parcel under contract, both of the following conditions are met:*

*A commercial, industrial, or residential building is constructed that is not allowed by this chapter or the contract, local uniform rules or ordinances consistent with the provisions of this chapter, and that is not related to an agricultural use or compatible use.*

*(2) The total area of all of the building or buildings likely causing the breach exceeds 2,500 square feet for either of the following:*

*(A) All property subject to any contract or all contiguous property subject to a contract or contracts owned by the same landowner or landowners on January 1, 2004.*

The above material breach provisions clearly apply because the Event Barn exceeds 2,500 square feet, and is not related to an agricultural use or compatible use. Section 51250 sets out the procedures a county should follow in notifying the owner of a material breach, and the subsequent steps that are required. If not already underway, this process should begin immediately.

## **Conclusion**

Anyone reading the applicants' use and zoning permit applications would have good reason to be skeptical. Who uses a 5,000 square foot building to "process" four gallons of lavender oil with a compact still? Or hosts weddings whose "primary function" is to promote agricultural products? But the applicants' track record here – building an "Ag Exempt" structure with extravagant finishes and amenities, aggressively promoting a luxury Event Center on Williamson Act land – strongly indicates that they lack any serious intent to respect the agricultural laws and regulations that actually apply to this property.

Less than a year ago, the owner claimed that he was building a barn to store "farm equipment, hay + grain" in his original sworn Ag Exempt permit application, and the County accepted those representations. The applicants' latest representations – that the planned weddings and events are "incidental" to the building's supposed "primary function [of] processing and sale of crop products" – are contradicted by their own public statements and marketing materials, as well as common sense. There is no basis for the County to accept them. The County should deny the Use Permit Application and pursue enforcement for the applicants' existing code and Williamson Act violations.

Very truly yours,

Protect San Antonio Valley

Kathleen Lavigna - 1250 San Antonio Road, Petaluma  
William Byrne - 1250 San Antonio Road, Petaluma  
Michael Mayo - 1000 Longhorn Lane, Petaluma  
Guillermo Duran - 1000 Longhorn Lane, Petaluma  
Deirdre Hockett - 1255 San Antonio Road, Petaluma  
Chris Hockett – 1255 San Antonio Road, Petaluma  
Tom Gawronski – 2000 Longhorn Lane Petaluma  
Anne DeChelbor - 2000 Longhorn Lane Petaluma  
Elizabeth Carpenter - 1205 San Antonio Road, Petaluma  
Mark Carpenter - 1205 San Antonio Road, Petaluma  
Lacey Lavigna - 911 B Street, Petaluma  
Adam Lavigna - 413 Black Oak, Petaluma  
Stefanie Lavigna - 413 Black Oak, Petaluma  
Cara Marchando - 1275 San Antonio Road

(Additional signatures will be submitted separately)

# Sample “Villa Vanto” Photos

From Villa Vanto Website, Instagram and Tik Tok Pages

4485 D Street Ext.  
Petaluma



# Villa Vanto Website

## Home page on March 25, 2022



VILLA VANTO

[Home](#)

[Events](#)

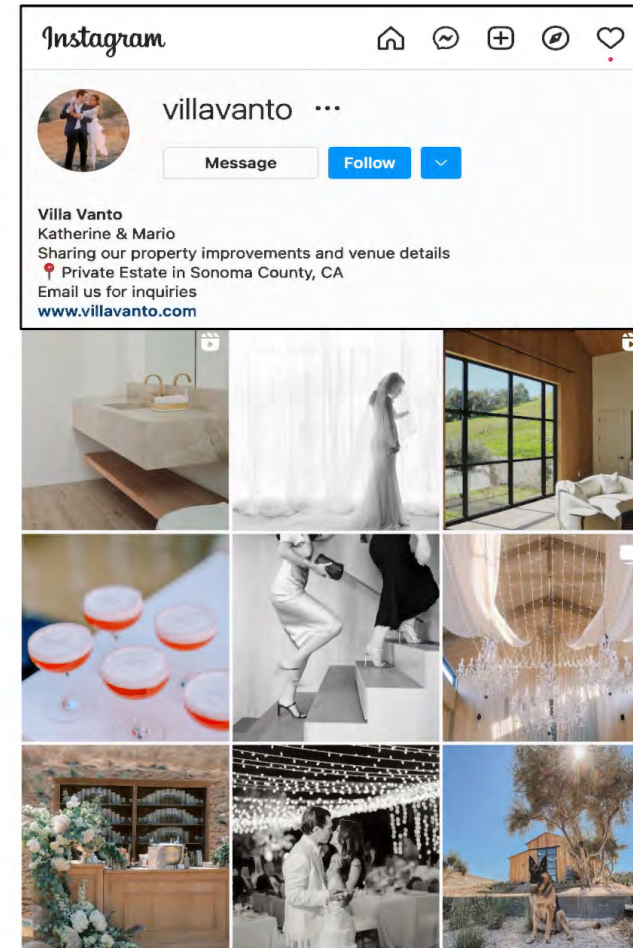
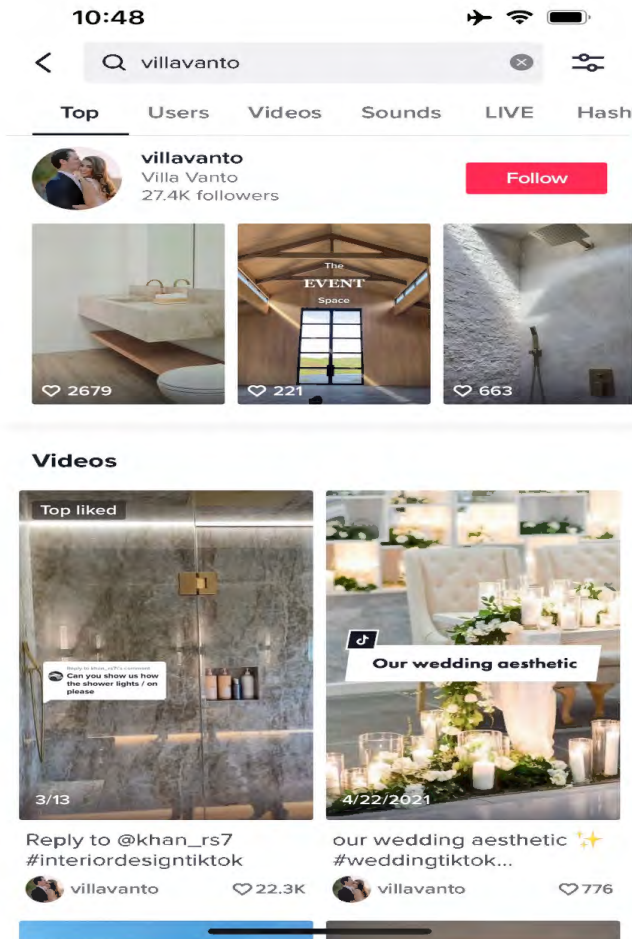
[About Us](#)

[Gallery](#)

[Contact Us](#)

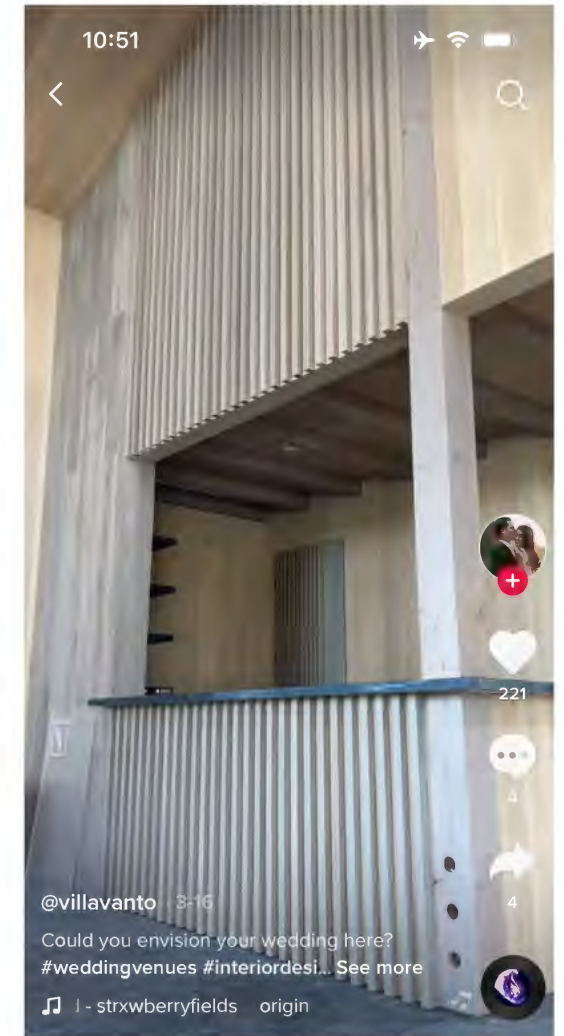
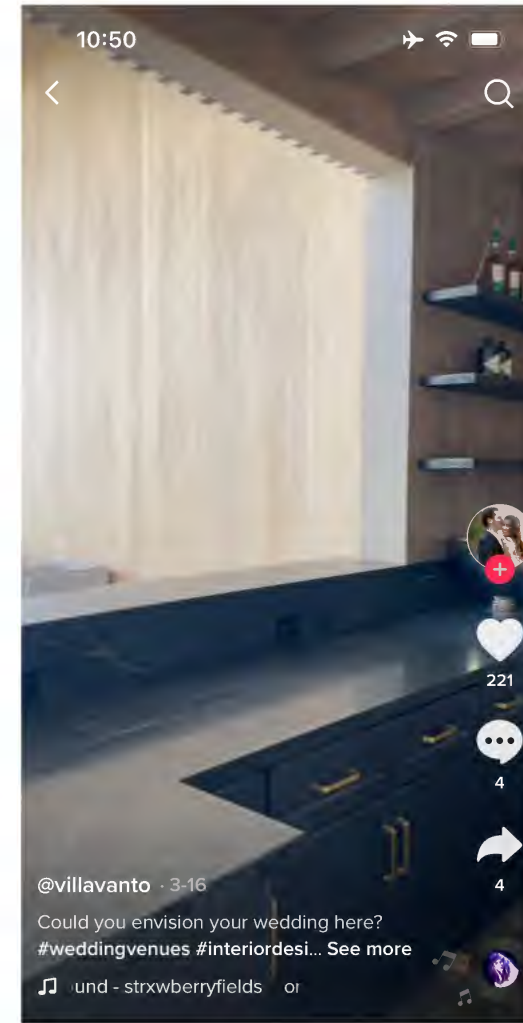
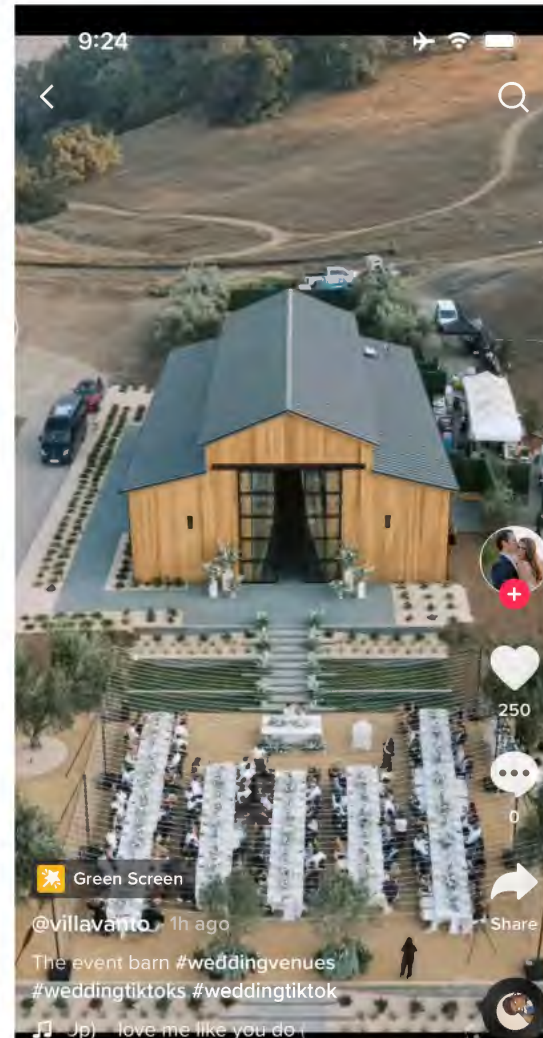
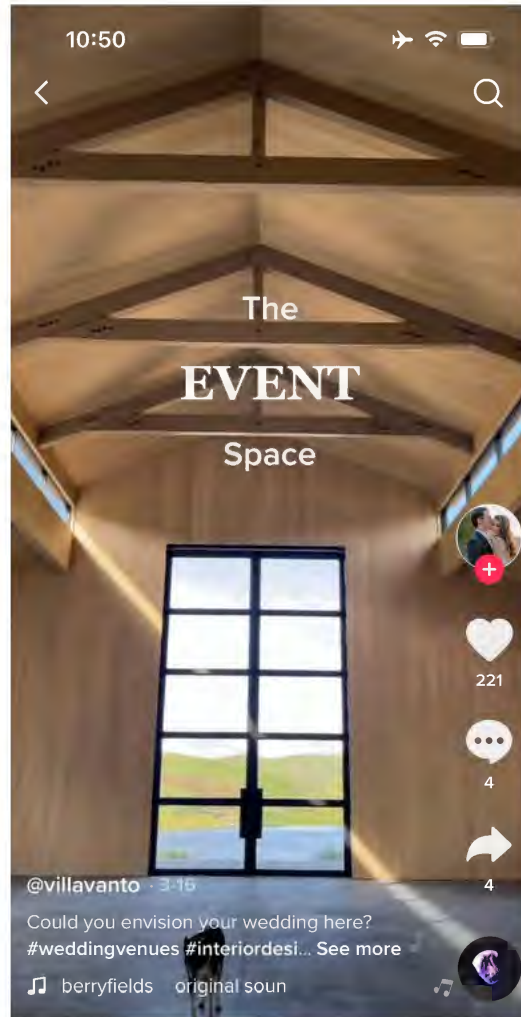


# Tik Tok and Instagram Pages for Villa Vanto on March 25, 2022

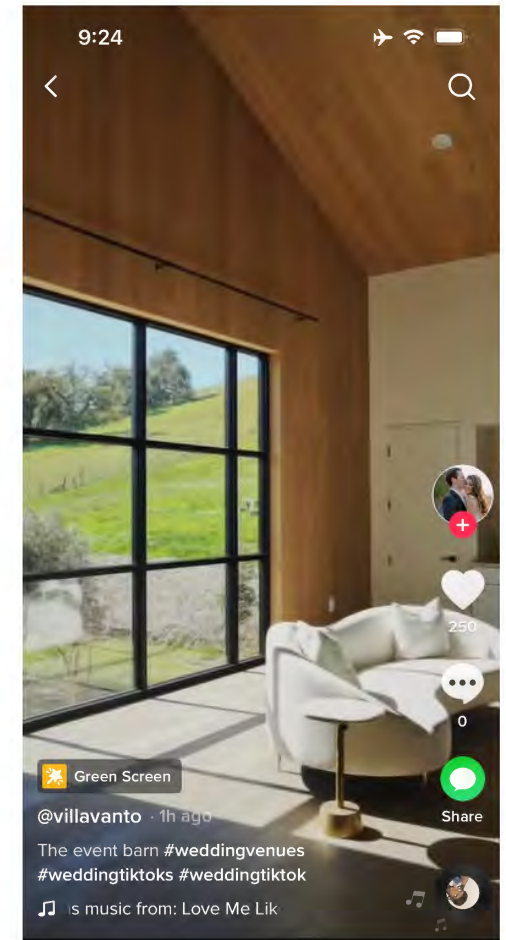
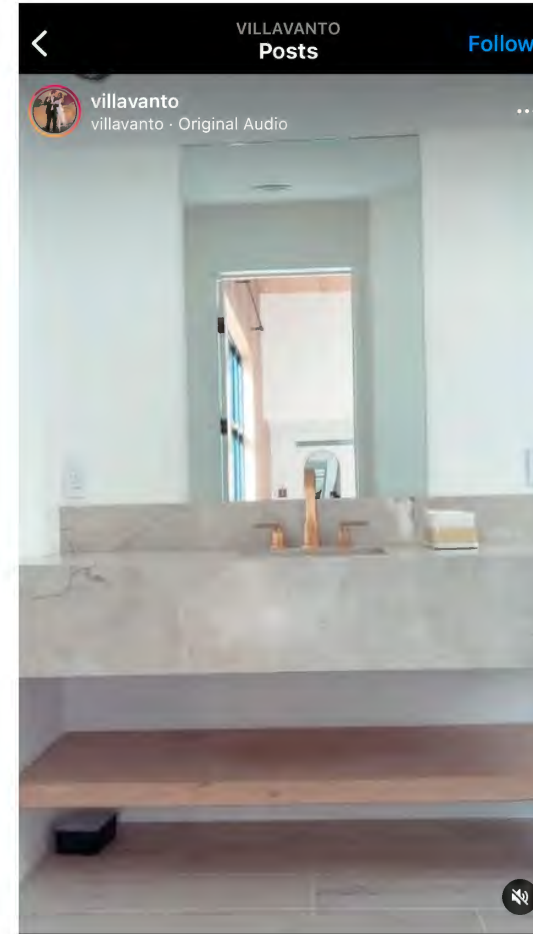
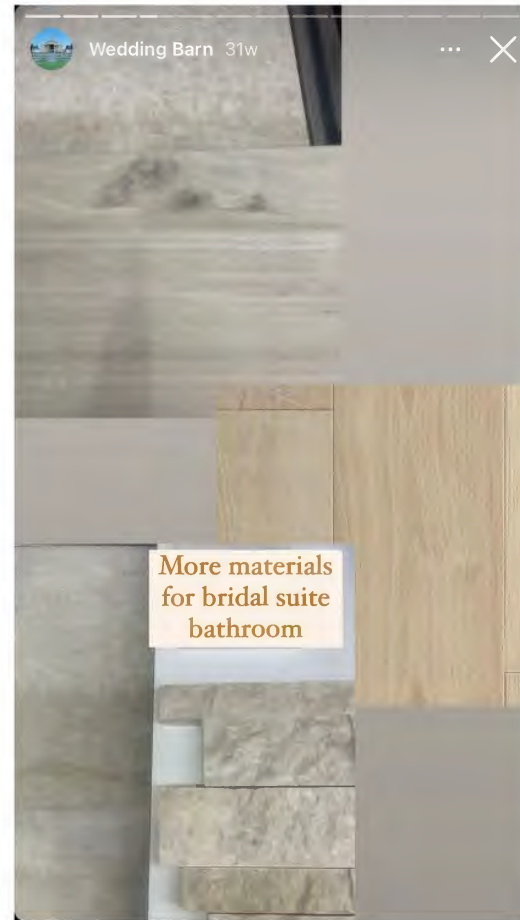




# Event Barn – interior and exterior spaces

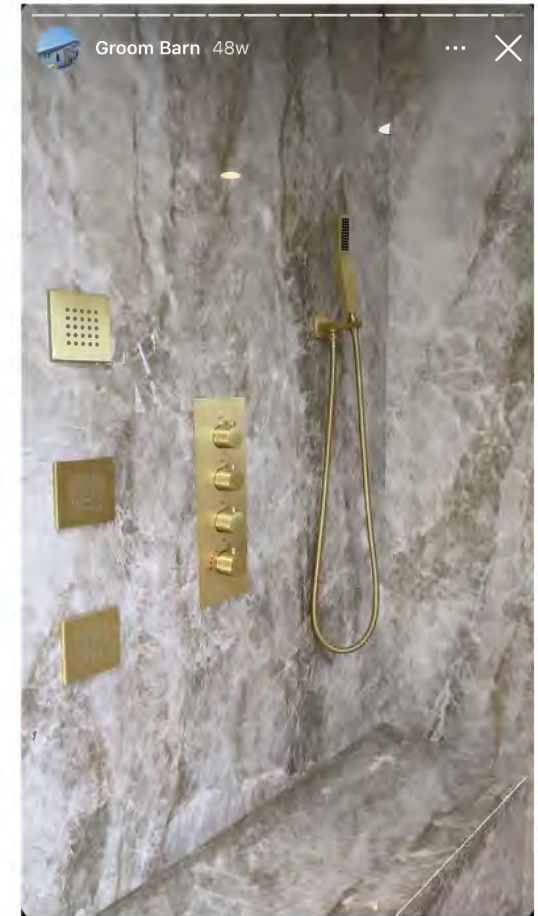


# Bridal Suite in Event Barn





# “Groom Barn”





# NEIGHBORHOOD COALITION

*NeighborhoodCoalitionSonomaCounty.com*

December 19, 2024

To:

David Rabbitt

Pat Gilardi 2nd District

Larry Reid 2nd District

Joshua Miranda

Hannah Spenser.

Head of Permit Sonoma

Permit Sonoma Scott Orr

Tyra Harrington

PlanningAgency@sonoma-county.org

David.Rabbitt@sonoma-county.org

Pat.Gilardi@sonoma-county.org

Larry.Reid@sonoma-county.org

Joshua.Miranda@sonoma-county.org

Hannah.Spenser@sonoma-county.org

Tennis.Wick@sonoma-county.org

[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)

Tyra.Harrington@sonoma-county.org

Re: Ghilotti Project at APN 020-130-037 4485 D Street, Petaluma; Use Permit Application UPE21-0064, File: PLP24-0012

Dear Planning Commissioners/ Board of Zoning Adjustments, Supervisor Rabbitt, and Permit Sonoma

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible land use policies in Sonoma County.

UPE21-0064 has requested Zoning Permits for a small-scale agricultural processing facility and retail sales facility to process and sell lavender products grown on-site. In addition, a Use Permit is requested to hold 28 annual agricultural promotional events for up to 200 attendees each, running for up to 11 hours, with amplified music.

Our concern is with the Use Permit portion of the application (promotional events) as the proposed events and the proposed event center are completely inconsistent with the true agricultural use that the property is zoned for. The applicant's past actions bear out these concerns, as their events and advertising have not been of events that promote agriculture as required by State and County code.

We request Permit Sonoma and the Planning Commissioners/Board of Zoning Adjustment remove the Use permit (for events) portion from this application.

### **County Law and Intent:**

The property is zoned LEA and is currently under the Williamson Act (California Land Conservation Act). These Uniform Rules restrict the primary use of agricultural contracted properties to commercial agricultural production and any non-agricultural use must be an allowable, compatible use and limited in size.

Article 06, Section 26-06-005. The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses.” Policy AR-4a.

In addition, the General Plan requires any visitor serving uses not just to be related to agriculture, but also limited and secondary to agricultural production: Objective AR-6.1: Give the highest priority in all agricultural land use categories to agricultural production activities. Visitor serving uses shall ***promote agriculture and enhance marketing of Sonoma County agricultural products, but shall be secondary and incidental to agricultural production.***

The proposed visitor-serving area violates the General Plan and LEA zoning regulations because it is not “secondary and incidental to agricultural production”.

The proposed events violate Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zones (SCUR) as it allows only events that are “directly related to agricultural education or the promotion or sale of agricultural commodities and products produced on the contracted land.”

The Use Permit application is for 28 promotional events. They state Promotional events will include a variety of events such as farm-to-table meals, educational seminars, field trips, agricultural industry meetings, custom scent workshops, customer events, and private gatherings. The following types of promotional events are proposed annually:

- a. 15 **Private Gatherings** (80-200 attendees) -up to 3,000 guests per year
- b. 10 **Customer, Educational, Marketing, Farm to Table Events** (40-120 attendees)-up to 1,200 guests yr
- c. 2 Charity Fundraising Events (50-150 attendee – up to 300 guests per year
- d. 1 Industry related event (40-120 attendees) – up to 120 guests per year

### **Observations with concerns:**

**First**, the facility and the surrounding grounds would never be effective for agricultural use and no honest observer would look at these and consider such. Pictures of the facility and grounds (see two pictures attached below) taken from their website [www.villavanto.com](http://www.villavanto.com), includes the statement “the barn will be used for lavender storage, processing and packaging.” Yet the picture shows a high-end facility, nothing like a “barn”, nothing like what would be used for agricultural purposes. Further, there is no farm equipment in the picture nor any indication of a farm operation in the picture. And what lavender is pictured is not the focus (shouldn’t it be if the true purpose of the application is a lavender farm?) but rather is shown as a background ornamental bush to make a nice picture of an event site.

The applicant’s map of the property calls for a “future equestrian barn”, “Outdoor Kitchen...”, and “Deck for cooking lessons.” Again, none of these activities have any relationship to operating a lavender farm nor do the proposed events. The purported lavender cultivation seems to be a convenient hook for non-conforming events and enterprises having nothing to do with lavender.

**Second**, in the past the applicant has advertised this as a dedicated event venue (weddings, etc.); this confirms the applicant’s true objectives have nothing to do with promoting agriculture. Other commenters on this application have already provided supporting documentation as to this misrepresentation. (The facility’s social media accounts refer to it as the “Event Barn,” or “Wedding Barn”). It’s telling that the applicant recently removed these same promotions from its own website. Permit Sonoma’s staff report documents and confirms these uses had nothing to do with agriculture (violations: March 2022 unpermitted conversion of agricultural barn to event center. Two Notice and Orders issued: VPL22-0111: Unpermitted events (events ceased, violation closed).

**Third**, the applicant’s own description of the promotional events underscores the question as to how they have any legitimate connection with the support and promotion of agriculture. Over half are *private gatherings* (weddings?). All allow for *amplified music*, for up to *11 hours* (concerts?). The code requires these event activities to promote local agricultural products and be secondary and incidental to agricultural production. The economics quickly demonstrate that the applicant intends just the opposite – that the lavender production would be incidental to the big events, not secondary or incidental as required by the code. How much income would come from these events (28 events/4600 participants) compared with the sale of lavender? Are these truly secondary and incidental to the ag production? Again, using the lavender hook, the application states each event participant would be required to purchase a lavender product. If these participants were truly coming for a lavender focused event, why the requirement to buy? Wouldn’t that be their primary objective? It sounds like the applicant is trying to fit a round wedding/entertainment peg into a square agricultural zoned hole. In other words, the Use Permit portion of the application fails to comply with the code requirements.



## **Conclusion:**

The Neighborhood Coalition has no objection to the applicant's plans to grow and process lavender on their property, or to engage in limited retail sales of these lavender products. Our concern is with the Use Permit portion of the application (promotional events) as the proposed events and the proposed event center are inconsistent with the true agricultural use that the property is zoned for. It is not reasonable to allow 28 events a year, with up to 200 attendees', with live music until 10pm to help sell lavender. These events are neither incidental nor secondary to the cultivation of lavender.

Sincerely,  
Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors  
SonomaNeighborhoodCoalition@gmail.com

CC:

Greg Carr 1st District  
Tim Freeman 1st District  
Evan Wiig 3rd District  
Jacquelynn Ocaña 3rd District  
Shaun McCaffery 4th District  
Eric Koenigshofer 5th District  
Webster Marquez 5th District

Greg.Carr@sonoma-county.org  
Tim.Freeman@sonoma-county.org  
Evan.Wiig@sonoma-county.org  
Jacquelynn.Ocana@sonoma-county.org  
Shaun.McCaffery@sonoma-county.org  
Eric.Koenigshofer@sonoma-county.org  
Webster.Marquez@sonoma-county.org

County Counsel  
Head County Counsel

Jennifer.Klein@sonoma-county.org  
Robert.Pittman@sonoma-county.org

Pictures of facility and grounds taken from their website [www.villavanto.com](http://www.villavanto.com) :



**From:** [William Byrne](#)  
**To:** [Joshua Miranda](#)  
**Cc:** [Grundy, Earl@DOC](#); [Hannah Spencer](#); [Nathan Peacock](#)  
**Subject:** PLP234-0012  
**Date:** Tuesday, January 7, 2025 7:49:04 AM

---

## EXTERNAL

Joshua,

In early December 2024 I submitted a letter in response to the application of Use Permit PLP24-0012. In that letter I posed multiple questions to you regarding your actions in approving this application. To date, none have been addressed. If these questions need to be formatted differently, please advise.

In July 2024, in a meeting with you at Permit Sonoma offices, our group asked about the status of the material breach that occurred and was reported to your department in August 2022. Permit Sonoma issued violations occurring on a Williamson Act Property. The State statute is very specific as to the protocols to be followed in this instance:

([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=51250.&lawCode=GOV](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51250.&lawCode=GOV))

I see no evidence that any of these protocols were followed. Please advise as to the status of this investigation. In July 2024 you stated:

"Staff is looking into the details of the Code Enforcement and contract compliance review history. I will provide once I have compiled any such shareable documents."

This investigation was supposed to occur in August 2022.

I was previously told by you that my questions submitted in July and December 2024 regarding this proposal would be addressed by now. Please advise as to the timeline proposed for this.

William Byrne  
707-972-6167

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

---

**From:** William Byrne <williamcbyrne@gmail.com>  
**Sent:** Tuesday, January 7, 2025 12:58 PM  
**To:** Tennis Wick <Tennis.Wick@sonoma-county.org>  
**Subject:** 4485 D Street Petaluma

**EXTERNAL**

Mr Wick

There is a Use permit application for this address on file. The project is being opposed by the surrounding community. In August 2021 Protect San Antonio Valley group alerted the county that there was a possible breach of the Williamson Act occurring at this address due to illegal building construction. Both you and David Rabbitt were contacted. Your reply:

"Good afternoon, Petalumans.

As the Supervisor has indicated, we will monitor the property and follow up on the points made in your letter with Planning staff that administer the Williamson Act contract and the Scenic Corridor."

However, it appears you vboth did not do this. A reported breach of the Williamson Act requires specific actions that do not appear to have been carried out.

[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=51250.&lawCode=GOV](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51250.&lawCode=GOV)).

My inquiries with staff regarding this State statute have produced no results.  
Please advise

Willim Byrne 707-972-6167

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

**From:** [William Byrne](#)  
**To:** [Hannah Spencer](#); [Tennis Wick](#)  
**Subject:** Re: PLP24-0012  
**Date:** Friday, January 10, 2025 1:19:44 PM

---

## EXTERNAL

Hannah,

The State legislature provided a statute for the cooperation between the DOC and local jurisdictions on the management of the Williamson Act. The document itself reflects the complexity of the issues involved. The procedures and protocols are very specific, especially on matters of breach of contract employing timelines and action items to be specifically followed ([https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=51250.&lawCode=GOV](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51250.&lawCode=GOV)).

My inquiries into this required investigation of the alleged breach have referred me back to the agency in charge, Permit Sonoma, as being responsible for executing these actions. Project Protect San Antonio Valley asked about your process regarding breach of contract very early in this dispute process, with no answers provided.

I have asked the Department of Conservation if they had been notified. They vaguely answered that they are monitoring the situation. Where is the evidence that you proceeded as specified by law? What is required by the law is vastly different from what you did. The legal ramifications between following procedure and disregarding timelines, notifications and protocols is significant.

It seems to me, as everything in this process does, that Permit Sonoma constantly defers to the applicant on every issue, hiding facts and disguising timelines and not evaluating the conflicting evidence provided by the applicant in the Use permit application.

Permit Sonoma eventually did issue Red Tags on this project after months of notifications from neighbors about the building issues, but it did not stop the applicant from continuing to build the event center. PS did not intervene beyond this initial paperwork and did not execute the actions required by law for the alleged breach of contract. This is notable.

The applicant wilfully ignored all of the Sonoma County requirements for development and is being rewarded for their affront. This appears to be another example of the county agencies cooperating in this egregious effort. Had Permit Sonoma acted timely and officiously, the present situation would be vastly different.

Please advise

William Byrne  
707-972-6167

**From:** [William Byrne](#)  
**To:** [Joshua Miranda](#)  
**Subject:** PLP24-0012  
**Date:** Tuesday, January 07, 2025 7:00:26 AM

---

**EXTERNAL**

Joshua,  
early December I submitted a letter in response to the application of Use ZPermit PLP24-0012.  
In that letter I posed multiple questions to you regarding your actions in approving this application. None have been addressed. If these questions need to be formatted differently, please advise.  
In July 2024, in a meeting at Permit Sonoma, our group asked about the status of the material breach that occurred and was reported to your department

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

## Joshua Miranda

---

**From:** William Byrne <williamcbyrne@gmail.com>  
**Sent:** Thursday, December 12, 2024 5:56 AM  
**To:** Joshua Miranda  
**Subject:** Re: LP24-0012 (4485 D St., Petaluma) BZA Cancellation Notice

EXTERNAL

Joshua

Scheduling and then rescheduling these events is becoming a major inconvenience. There are many of us opposed to this scam. We take this issue seriously and plan on attending this pivotal meeting. However, we all have lives, responsibilities and jobs to arrange and then rearrange.

Are we also allowed to cancel/reschedule these meetings when we have a conflict?

What are the parameters for "our" side of this dispute?

I want the same rights surrounding this scheduling as the applicant. I want the applicant to be limited in their abrupt decisions regarding the schedule. If they can cancel it due to their "priorities", I want the same ability.

Please advise

William Byrne  
707-972-6167  
Sent from my iPhone

On Dec 11, 2024, at 4:55 PM, Joshua Miranda <Joshua.Miranda@sonoma-county.org> wrote:

Good Afternoon William,

I have received your letter from your previous email, thank you for your comments. I will need time to review and answer and may not have said answers until later next week. When I respond to the letter I will additionally respond to the questions below.

The property owner made us aware that he had a scheduling conflict, and is out of town, resulting in the cancellation.

<image001.jpg>

**From:** William Byrne <williamcbyrne@gmail.com>  
**Sent:** Tuesday, December 10, 2024 7:10 AM  
**To:** Joshua Miranda <Joshua.Miranda@sonoma-county.org>  
**Subject:** LP24-0012 (4485 D St., Petaluma) BZA Cancellation Notice

EXTERNAL

Joshua

What was the specific reason for this second cancellation?

How many times can an applicant delay/reschedule these meetings?

What is the cost to the applicant for these scheduled meetings?



Yesterday, I posted a comment letter based on the application. I asked at least a dozen questions regarding your approval of this use permit application. When can I expect to receive the answers to these questions from you?

I am still awaiting answers to several questions I asked when the permit was first submitted in July. Where can I find the resolution, if any, from the State Water Board's determination that the project required an upgraded water system?

Who would be the contact person at CDFW regarding the Sensitive Species vs grading proposals vs already completed projects.

Please advise

William Byrne  
707-972-6167

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.



## Joshua Miranda

---

**From:** William Byrne <williamcbyrne@gmail.com>  
**Sent:** Monday, December 09, 2024 11:26 AM  
**To:** Joshua Miranda  
**Subject:** Re: PLP24-0012 (Address) BZA Notification 12/2/24  
**Attachments:** MND Letter 12924.pdf; ADA RULES.png; MARIO PROCESSING PLAN.pdf

### EXTERNAL

Please find attached a letter commenting on the MND.

I have posed several questions regarding the accuracy of the information presented, and mentioned several CBC items that need to be addressed regarding ADA and required construction details.

Please advise  
William Byrne  
707-9072-6167

On Fri, Dec 6, 2024 at 4:48 PM Joshua Miranda <[Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org)> wrote:

Good Afternoon,

Please see the link below for the hearing agenda for PLP24-0012. Within the link are the materials for the hearing.

<https://permitsonoma.org/boardofzoningadjustmentsmeetingdecember122024>



**Josh Miranda**

**Planner III**

2550 Ventura Avenue, Santa Rosa, CA 95403  
[www.PermitSonoma.org](http://www.PermitSonoma.org)

**o:** 707-565-1900

**d:** 707-565-1948

[Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org)



Lobby hours: Monday, Tuesday, Thursday, Friday 8:00 AM to 4:00 PM. Wednesday 10:30 AM to 4:00 PM

---

**From:** Joshua Miranda

**Sent:** Thursday, December 05, 2024 5:02 PM

**To:** Protect San Antonio Valley <[protectsanantoniovalley@gmail.com](mailto:protectsanantoniovalley@gmail.com)>; Joshua Miranda <[Joshua.Miranda@mx0b-006da801.pphosted.com](mailto:Joshua.Miranda@mx0b-006da801.pphosted.com)>

**Cc:** [farl.grundy@conservation.ca.gov](mailto:farl.grundy@conservation.ca.gov); [tweed56@gmail.com](mailto:tweed56@gmail.com); [chris.hockett@gmail.com](mailto:chris.hockett@gmail.com); [dahockett@gmail.com](mailto:dahockett@gmail.com); [kt1255@gmail.com](mailto:kt1255@gmail.com); [williamcbyrne@gmail.com](mailto:williamcbyrne@gmail.com); Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Christa Shaw <[Christa.Shaw@sonoma-county.org](mailto:Christa.Shaw@sonoma-county.org)>; Jennifer Klein <[Jennifer.Klein@sonoma-county.org](mailto:Jennifer.Klein@sonoma-county.org)>; Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>; Ivan Jimenez <[Ivan.Jimenez@sonoma-county.org](mailto:Ivan.Jimenez@sonoma-county.org)>; Larry Reed <[Larry.Reed@sonoma-county.org](mailto:Larry.Reed@sonoma-county.org)>; Pat Gilardi <[Pat.Gilardi@sonoma-county.org](mailto:Pat.Gilardi@sonoma-county.org)>; Andrea Krout <[Andrea.Krout@sonoma-county.org](mailto:Andrea.Krout@sonoma-county.org)>

**Subject:** RE: PLP24-0012 (Address) BZA Notification 12/2/24

Good Afternoon,

The letters that I have received to date are included in the materials for the public hearing. They will be published tomorrow on the Permit Sonoma website, and publicly available for review. Once they have uploaded I will follow up with the link for the review. This link will also contain all other hearing materials.



**Josh Miranda**  
**Planner III**  
2550 Ventura Avenue, Santa Rosa, CA 95403  
[www.PermitSonoma.org](http://www.PermitSonoma.org)  
**o:** 707-565-1900  
**d:** 707-565-1948  
[Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org)



Lobby hours: Monday, Tuesday, Thursday, Friday 8:00 AM to 4:00 PM. Wednesday 10:30 AM to 4:00 PM

---

**From:** Protect San Antonio Valley <[protectsanantoniovalley@gmail.com](mailto:protectsanantoniovalley@gmail.com)>

**Sent:** Tuesday, December 03, 2024 6:56 AM

**To:** Joshua Miranda <[Joshua.Miranda@mx0b-006da801.pphosted.com](mailto:Joshua.Miranda@mx0b-006da801.pphosted.com)>

**Cc:** [farl.grundy@conservation.ca.gov](mailto:farl.grundy@conservation.ca.gov); [tweed56@gmail.com](mailto:tweed56@gmail.com); [chris.hockett@gmail.com](mailto:chris.hockett@gmail.com); [dahockett@gmail.com](mailto:dahockett@gmail.com); [kt1255@gmail.com](mailto:kt1255@gmail.com); [williamcbyrne@gmail.com](mailto:williamcbyrne@gmail.com); Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Christa Shaw <[Christa.Shaw@sonoma-county.org](mailto:Christa.Shaw@sonoma-county.org)>; Jennifer Klein <[Jennifer.Klein@sonoma-county.org](mailto:Jennifer.Klein@sonoma-county.org)>; Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>; Ivan Jimenez <[Ivan.Jimenez@sonoma-county.org](mailto:Ivan.Jimenez@sonoma-county.org)>; Larry Reed <[Larry.Reed@sonoma-county.org](mailto:Larry.Reed@sonoma-county.org)>; Pat Gilardi <[Pat.Gilardi@sonoma-county.org](mailto:Pat.Gilardi@sonoma-county.org)>; Andrea Krout <[Andrea.Krout@sonoma-county.org](mailto:Andrea.Krout@sonoma-county.org)>; Joshua Miranda <[Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org)>

**Subject:** Re: PLP24-0012 (Address) BZA Notification 12/2/24

EXTERNAL

Dear Joshua,

Thank you for your notification of the hearing scheduled for December 12, 2024 with the Board of Zoning Adjustments.

In reviewing the public online file for project PLP24-0012 it appears that a number of documents are missing. Perhaps these are separately included in a briefing package to the planning commissioners; We're not familiar with the hearing process. However, in an initial review we identify six letters from interested parties that are not included in the public file.

These letters were submitted to Permit Sonoma between June 5 and September 3, 2024.

We would appreciate any light you could shed on this situation.

Thank you,

Protect San Antonio Valley

On Mon, Dec 2, 2024 at 1:51 PM Kylie Martin <[Kylie.Martin@sonoma-county.org](mailto:Kylie.Martin@sonoma-county.org)> wrote:

Good afternoon,

Please find the attached Board of Zoning Adjustments Notification mailed out today, December 2, 2024, for the project in the subject line. Please direct any questions and/or comments to the Project Planner at (707) 565-1948 or [Joshua.Miranda@sonoma-county.org](mailto:Joshua.Miranda@sonoma-county.org).

As per requested, the interested parties that have provided an email address have been included in this email. Interested parties who have not provided an email will be receiving a physical copy in the mail.

Thank you,



**Kylie Martin (she/her)**

**Administrative Assistant**

2550 Ventura Avenue, Santa Rosa, CA 95403

[www.PermitsSonoma.org](http://www.PermitsSonoma.org)

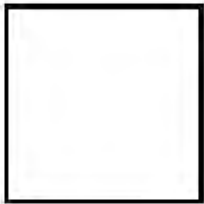
**o:** (707) 565-1900

**d:** (707) 565-1223

[kylie.martin@sonoma-county.org](mailto:kylie.martin@sonoma-county.org)



Lobby hours: Monday, Tuesday, Thursday, Friday 9:00 AM - 4:00 PM, Wednesday 10:30 AM - 4:00 PM.



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

William Byrne  
P O Box 2230  
Willits CA 95490  
707-972-6167

Joshua Miranda  
Permit Sonoma (PS)  
707-565-1948

Re: **PLP24-0012**

The building in question was designed and constructed as an event center. It is featured on architect's website as the ultimate Wine Country wedding event location (<https://www.mkmassociates.com/villa-vanto>). The owner hurriedly constructed this building to host his own wedding in August 2022. They erected a 30' tall light tower on D St., parked 100 plus cars in a grass field in August. They used the building for their event. Extensive grading was performed to complete this construction without PS permit approval. The owner signed a document, under penalty of perjury, that a permit was not required. The building was completed without any prior inspections. The owner basically broke all of the rules set out by Permit Sonoma to preserve and protect Sonoma county from indiscriminate development. Now, PS eagerly wants to approve this project, and consequently, this process. I am confused and insulted by this approach.

The project was Red Tagged by PS. The construction continued anyway. Yet, PS seems intent on approving this project in spite of all of the non compliant aspects of the project.

The CEQA document provided by the applicant is full of contradictory information, skewed to fit the item narrative. yet, nowhere is this objected to by PS. The narrative includes information on intended uses of the property that conflict with each other. PS does not address these inconsistencies at all. The submitted drawings show requirements that were ignored during construction. The public access requirements, plainly shown on the ADA website, with examples that directly apply to this building, were ignored. I questioned you directly about the location of the processing equipment being in a separate structure, as shown on the submitted drawings, rather than as stated, in the existing building. You seemed unfamiliar with the drawings. How much in depth investigating did you actually do?

In the Proposed Negative Mitigated Declaration—-Initial Study, you state

“Based on the evaluation in the attached Expanded Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measure into the project plans.”

**When you submitted this information to these State agencies, did you tell them that the work has been substantially completed prior to permit application?**

I would think it prudent for CDFW to know that the required professionals and scientists were not present during the illegal construction that has been underway since 2021 without design or permit review. It would seem prudent also to include the fact that the owner has already completed several grading operations without obtaining the necessary permits.

## **EXISTING FACILITY:**

“Current agricultural operations include 10 acres devoted to a beef cattle grazing operation, 8.5 acres of pastureland devoted to brood mares, and associated livestock infrastructure (fencing, corrals, water troughs). Currently, the landowner is planting 11.5 acres in lavender...”

There are **no grazing cattle** on this property. There is **no horse breeding program**. There is **no lavender**. It takes three years to establish lavender for processing and bees for honey. Olive trees take longer.

**When will the produce be available for promotion?**

**Which comes first, the farm or the events?**

## **PROJECT DESCRIPTION:**

**A 5020 ft structure is dedicating 310 ft to the lavender operation sales and storage.** The remaining 4700 sq ft is then a shared use. The drying of the lavender is at most a two week long process that occurs during harvest. If the project determines to harvest the proposed 11.5 acres, in two harvests, it may indeed require a drying space of this size for a 4-8 week period, twice a year. That is 16 weeks of use for the shared area versus 28 weekend events.

**But the proposal is to harvest only 2 acres of lavender, which is significantly less time and space required for building use.**

**If you are planting lavender for profit, why would you only harvest two acres?**

**Is the remaining 9.5 acres of lavender essentially landscaping, further removing pasture land from the equation?**

The project area is under-calculated. The new driveway is over an acre (20' x 2000') and is an enhancement, not a needed element. Since an existing road already exists, this is further development. As is the .5 acres used for the event center entrance on D Street. The party site is over 60,000 sq ft. not the .87 acres declared elsewhere in this document. The mowed field for parking is 27,000 sq ft. Is grazing allowed on the new septic spray field? That is addition acreage taken out of pasture land.

## **Small Scale Agricultural Processing:**

“The proposed small-scale processing will take place within the existing 5,020 square foot, 2 story agricultural structure, located at the south end of the property, where the distillation equipment is housed, and the processing will be contained within the existing structure. “

There is no dedicated space within the building structure for the equipment needed to process the lavender. The drawings plainly show a separate building to house the processing equipment, and a dedicated work area outside of the building.

**Why did you not address this?**

### **Use Permit for Agricultural Promotional Events**

“The applicants also proposed to have up to 28 annual agricultural promotional events per year to promote the farms products described above. The proposed events will also be used to educate customers and event attendees about the farm’s products produced onsite, and about the practices implemented onsite. Promotional events are planned to take place outdoors at the adjacent areas to the barn structure, and the barn structure at times. The barns’ primary function is to house farm equipment and the processing operation but is also proposed to be used at times in conjunction with the proposed events. “

The wedding parties, etc, are not a function of a farming operation. The attendees are not customers for the farm products. The processing will not be used in conjunction with the events. It is not possible to use the event center main room for both farm and event activities at the same time.

**Which takes preference?**

**Please explain what happens to this proposed mixed use when the property owners decide to not harvest the lavender, for whatever reason? Do the events stop?**

**Why is 11.5 acres planted but only 2 acres harvested? Is it because the intended use only as landscaping?**

“The agricultural products produced on site include dried lavender, hydrosol, sachets, bath salts, essential oils, custom herbal perfume scents, olive products, and honey. “

**There are no agricultural products produced onsite, no plants, no bees, no equipment.**

Lavender is a slow growing perennial that may bloom in its first year but takes three or more years to fully mature. Their growth rate will largely depend on the variety, and most varieties will take roughly three years to become fully mature plants.

**How can you promote a crop that does not exist?**

**How can you approve a project that has no substance?**

**How can you allow an event center based on a farm that is yet to be productive in any way?**

**How can you have a secondary use before you have a primary use?**

**What happens when the owners decide to not harvest anything in the future, for whatever reason?**

**Will the County still allow the event center to operate?**



## Music:

The building is located in an acoustic bowl that amplifies any sound being created. See the attached comments by others with surrounding properties. The general rules noted by the applicant are not area specific.

It is noted in the introduction:

“All adjacent parcels share the same Land Extensive Agriculture (LEA) Land Use designation and LEA base zoning district. The property is located within a State Responsibility Area and in a Moderate Fire Hazard Severity Zone.”

Yes, everyone in this area lives here because of the rural setting and quiet surroundings. This building is completely out of character for the area in appearance and intended use. Party events throughout the year is more than concerning.

## AESTHETICS

“Considering the project site's "High" sensitivity and the project's "Subordinate" visual dominance, the project is considered to have a less-than-significant effect on the existing visual character or quality of the site and its surroundings. Significance Level: Less than Significant”

Irregardless of the design features or materials used, or the age of the structure, this sticks out like a sore thumb. It dominates the setting and will soon try to turn dry pasture land into something else that does not comply visually with the surrounding area.

### **More than Significant Impact**

1 C. “The character of the 56.76-acre site and surrounding lands is agricultural and rural development. The existing agricultural barn structure utilizes wood siding and is set back approximately 1,500 feet from D Street, which helps blend the building into the natural setting without substantial degradation of the existing visual character. The proposed parking lot will be adjacent to the structure and will not be visible from the public road.”

This building does not, in any way, blend into the natural setting. The parking for 150 cars will be on a mowed dry grass field adjacent to D Street, **HIGHLY VISIBLE**. The owner held an event on this site without a permit and parked 100+ cars on the dry grass field along D Street in August 2022. He erected a 30' tall light tower on D Street during the event.

### **More than significant Impact**

2 B. Conflict with existing zoning for agricultural use, or Williamson Act Contract? “The proposed project is consistent with General Plan objective Agricultural Resources Element Policy AR-4.1 and Policy AR 4a “

A use permit is not needed to farm this parcel or to sell farm products. It is necessary because the existing illegal structure and its intended use as an event center is not allowed on this parcel. They are proposing to plant 11.5 acres of crop. but only harvest 2 acres. The rest is landscaping for the 28 events. They are attempting, with the unrelenting help of PS, to legalize a structure that should not exist.

“The proposed decrease in the number of cattle onsite would be offset by the proposed establishment of 11.5 acres of lavender to be planted. A combination of the maintenance of 11 acres of grazing land, 11.5 acres of lavender, 8.5 acres of pastureland for breeding brood mares maintains 42.5 acres of land (or 75% of the property) devoted to agricultural uses consistent with the Sonoma County Uniform Rules minimum agricultural use threshold of 50% of the property. Additionally, the current agricultural operation generates an average of \$4,000 per year



and is expected to continue meeting the Uniform Rules minimum annual gross income requirement of \$2,000.00 per Farm Operation and \$2.50 per acre of production.”

The event center (1.5 acres), new driveway (1 acre), new access (.5 acres), landscaping (9.5 + acres), Spray septic field (2-5 acres), parking lot (.75 acres) and it looks like a new-12 bed room building is being proposed (.5 acre).

**That is 15-20 acres being removed from the intended use under the Williamson Act.**

**As previously requested, I would like to see the project owner’s annual reports submitted to Sonoma County documenting this income. This is undocumented information. There is no real basis for these statements.**

“ Uniform Rule 8.3 H allows agricultural promotional events provided they meet the following requirements: 1. Special events, when directly related to agricultural education or the promotion or sale of agricultural commodities and products produced on the contracted land, provided that: a. The events last no longer than two consecutive days and do not provide overnight accommodations: and

**b. No permanent structure dedicated to the events is constructed or maintained on the contracted land.”**

A wedding event is in no way directly related to any of these requirements, irregardless of how the party is decorated. The majority of the product being promoted is not even being harvested or sold or used other than as landscaping for the event center.

Obviously, the building was designed and constructed as an wedding event center. See the description by the designer above (<https://www.mkmassociates.com/villa-vanto>).

**The owner’s bypassed Permit Sonoma’s design and review process as part of a scheme to defraud the County and taxpayers. The existing illegal structure cannot be made legal by further deception .**

“Uniform Rule 8.2 allows compatible uses to be developed on contracted land provided that they collectively occupy no more than 15% of the contracted land as a whole, or 5 acres, whichever is less, excluding public roads, private access roads, and driveways. The proposed farm retail, small ag processing facility, agricultural barn structure septic system, and parking lot, and outdoor areas to be used by the event collectively occupy 1.43 acres, which is less than the maximum 5-acre compatible use threshold allowed under contract. “

I reiterate: The event center (1.5 acres), new driveway (1 acre), new access (.5 acres), landscaping (9.5 + acres), Spray septic field (2-5 acres), parking lot (.75 acres)and it looks like a new-12 bed room building is being proposed (1 acre). That is 15-20 acres being removed from the intended use under the Williamson Act.

## **Biological Resources**

There are 8 pages (BIO-1 through BIO-13) listed as pre-construction mitigation measures to be performed prior to construction. The majority of the construction is already completed. The owner did illegal grading.

### **How do you mitigate damage already done?**

### **How do you plan on addressing all of this biological damage already committed by lack of design, review and oversight?**

“ Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance? “

Sonoma County requires design, review and oversight of any commercial construction.

**This project was submitted as AEX in order to circumvent these requirements. Allowing this now sets a new standard for scamming Sonoma County and its residents.**

### **Disturb any human remains, including those interred outside of dedicated cemeteries?**

The report does not mention that the site was graded illegally prior to inspection and that site integrity has been compromised.

## **Landslides?**

“The project site is in a landslide prone area as shown on General Plan Public Safety Element Figure PS-1d: Deep-seated Landslide Hazard Areas, but the project proposes no new construction, and if new construction is proposed in the future, all work would be subject to the California Building Code.”

The project is trying to legalize the “new” construction in reverse. This review is trying to justify completed development by looking in the rear view mirror.

### **Result in substantial soil erosion or the loss of topsoil?**

Comment: The project includes grading for the driveway which require the issuance of a grading permit. In regard to water quality impacts, County grading ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements, are specifically designed to maintain potential water quality impacts at a less than significant level during project construction. For post construction water quality impacts, adopted grading permit standards and best management practices require creation of areas that allow storm water to be detained, infiltrated, or retained for later use. Other adopted water quality best management practices include storm water treatment devices based on filtering, settling or removing pollutants. These construction standards are specifically designed to maintain potential water quality grading impacts at a less than significant level. Significance Level: Less than Significant Impact.

**Was the State Water Quality Control Board notified that the grading was done without permits and that there were no inspections or mitigation measures put in place?**

Grading was already done without a permit.

**Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

“Events will take place indoors and outdoors on improved areas and not in high grass or remote areas on the site.”

The proposal is to park 150+ vehicles in a mowed grass field, in a high risk area, during fire season.

**Explain how this is no risk?**

“No new structures are proposed, however the agricultural barn structure will be required to meet all current building standards for agricultural processing and commercial uses, including event uses.”

**The building is not ADA compliant.**

It is a two story commercial building that must allow access to all parts of the building. All parts of the building are not accessible.

<https://www.corada.com/documents/2019CBCPG/11b-206-2-3-multi-story-buildings-and-facilities>

The building code requires non combustible exterior siding. There is a stamp on the drawings specifying non combustable siding. The next page of the drawings specifies 1 x 4 cedar siding.

Cedar siding is not compliant.

The building was constructed with a highly combustible exterior cedar wood siding. It was sprayed on the hillside prior to installation with polyurethane, the same hillside illegally graded. I wonder where that urethane finish migrated to?

Just one more example of un-permitted excess and abuse.

**Furthermore, why did you not see this?**

**I do not think you have investigated this application with any kind of depth or precision.**

Total water usage between all the uses onsite:  
“65,400 gallons/year (Lavender Farming) + 24,000 gallons/year (Lavender Processing) + 37,500 gallons/year (Event Center) + 246,324 gallons/year (Landscaping) = 373,224 gallons or 1.15 acre-feet/year = Total Annual Project Water Use (Well #1) “

Please note the water usage for farm verses landscaping. Tell you anything?

**How do you have a working farm when the event center uses three times the amount of water than the farming uses (283,800 gallons allocated vs 89,400 gallons allocated) ?**

**How is this a secondary use?**

“The peak water usage for the project including farming, processing, events, and landscaping is expected to occur in July each year with an estimated daily demand of 2,355 gallons/day. Average water use for the project during the entire year is expected to be 1,023 gallons/day. “

Here is another jumbled, bogus reporting worth investigating. Average water use is a nice number when your demand is also average and constant.

Water demand, especially on a farm, varies greatly in Sonoma County. Ground water supply demand June through October is very high compared to the other months of the year.

**Wells go dry or their recovery is limited, especially on a Class 4 Groundwater Availability area, which this is.**

“Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. result in substantial erosion or siltation on- or off-site?”

The grading on this site, originally done without a permit in 2021, significantly altered the site. Water runs through this sight to adjacent properties, creating seasonal creeks that feed into San Antonio Creek. One such creek has been effected by this project. Inadequate and unmaintained construction site barriers allowed silt to flow into this seasonal creek. What was a rolling valley is now a flat building site waiting for more parking, table areas and driveways. The grading remains the same. The south hillside above the new building was scraped for agricultural use without an active permit. Several thousand yards of soil were left uncovered until the county was notified by me. The covers did not last very long and remain missing. This mount of soil sits above the seasonal creek mentioned above without adequate mitigation features.

**The author obviously has not been to the site or is not looking at whole project.**

“Comment: The proposed project would not modify or alter an existing creek, nor create runoff that would result in off-site or on-site flooding. Appropriate grading permits are required for the proposed road serving the agricultural structure. “Significance Level: Less than Significant Impact “

The appropriate grading permits were not procured prior to the grading already done on this property in 2021 and 2022. Significance Level:

**Significant Impact already occurred.**

**Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

“Comment: The General Plan Land Use Designation on the project parcel is Land Extensive Agriculture. This land use designation is intended to enhance and protect lands capable of and generally used for animal husbandry and the production of food, fiber, and plant materials in areas where soil and climate conditions typically result in relatively low production per acre of land. The primary use of any parcel within one of the three agricultural land use categories must involve agricultural production and related processing, support services, and visitor serving uses. Within the Land Extensive Agriculture Zoning designation, the Small-Scale Agricultural Processing and Farm Retail sales are permitted uses, and the primary use of the property will remain in agricultural production. The proposed Agricultural Promotional Events will promote and markets products produced onsite and are considered secondary and incidental to the property’s primary agricultural production and processing uses; consistent with General Plan Objective AR-4.1 and Policy AR-4a of the Agriculture Resources Element.”

Two very big “enhancements” in this paragraph. The Land Use Designation is not intended to enhance the land.

**Land Use Designation is correctly stated that it is intended to protect the land, and not abuse agricultural lands with unnecessary, unwanted, and illegal development.**

Visitor serving uses are not primary use of the land under the LEA. It is allowed as an additional resource for existing farms.

**This is not an existing resource and is several years delayed from producing any farm product.**

**The water use and land conversion from agricultural to commercial is extensive.**

They plan more area for landscaping than they do for farming. The building will be used more for events than for the farm in every way: occupancy, energy use, traffic to and from the site. The Event Center business will consume more water than the farm (use their statistics). They plan on a 2 acre harvest so the Event Center can maintain the landscaping features.

**“Mitigation Measure NOISE-1:** Outdoor amplified speech and amplified music is prohibited. Amplified noises shall be allowed to occur only within the agricultural barn structure.

This is a sound bowl. The noise will be naturally amplified

**Mitigation Monitoring NOISE-1:** Any noise complaints will be investigated by Permit Sonoma staff. If violations are found, Permit Sonoma shall seek voluntary compliance from the permit holder, or may require a noise consultant to evaluate the problem and recommend corrective actions, and thereafter may initiate an enforcement action and/or revocation or modification proceedings, as appropriate. (Ongoing)

This is totally inadequate to expect the neighborhood to police an already bad problem with a neighbor who patently ignores all of the rules until they get caught. Not okay.

### **Result in inadequate parking capacity**

The parking to be provided is in a mowed dry grass field. What could go wrong?

“TRIBAL CULTURAL RESOURCES: **Mitigation Monitoring TCR-1:** Building/grading permits shall not be approved for issuance by Permit Sonoma - Project Review Staff until the above notes are printed on the building, grading and improvement plans.”

See above comments on illegal grading already sited for by Permit Sonoma. The damage is done. A waiver was signed by the property owner swearing, under penalty of perjury, that he did not need a grading permit. He violated that sworn document with no consequences to date.

### **What are the repercussions?**

### **foreseeable future development during normal, dry and multiple dry years?**

“Comment: As discussed in section 10.b, the project would use groundwater for its water source. A County required hydrogeologic report determined that a sufficient groundwater supply is available to serve the project and that the project is unlikely to cause a decline in groundwater elevations or deplete groundwater resources over time. Potable water would be provided by the two existing private wells “

This does not answer the question asked about future development.

**There is a twelve bedroom septic system approved by Permit Sonoma that will be used for what?** Why a twelve bedroom septic system is allowed on a restricted property is a puzzle.



**Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

“Comment: Wildfire risk is dependent upon existing environmental conditions, including but not limited to the amount of vegetation present, topography, and climate. The project site is located within a rural area surrounded by open fields and gently sloping hillsides. Climate in the area is characterized as Mediterranean, with cool wet winters and hot dry summers.”

The comment does not answer the question. Now the property is gentle slopes, where previously they were steep. If there is a fire the smoke lingers in these small valleys, just like the fog does. The hot dry Summers are a very high fire risk. Add in 200 partygoers, 16 times a year, and risk percentages go up exponentially.

“ Proposed infrastructure improvements include a new driveway to provide public access to the agricultural production barn, in addition, the project proposes retaining existing access onsite which provides for two different driveways for emergency ingress and egress”

The new driveway is a luxury, as there exists an adequate road structure,  
**This proposed driveway will take over an acre of land out of agricultural use.**

“There are ponds, streams, and wetland features on the project site. Existing site elevations and topography would remain largely unchanged after project construction of the proposed driveway, and overall drainage patterns would essentially remain the same. The agricultural barn structure is already existing onsite and the footprint will remain the largely the same.”

The drainage was altered in 2021 with the unauthorized grading. It changed the runoff into the adjacent seasonal creek. The driveway and new construction featured on the submitted drawings (which also violates the Williamson Act rules), are to be cut into a steep hillside. The neighbor uphill has comment on the instability of the area.

“Comment: Potential project impacts on special status plant and fish/wildlife species and habitat are addressed in Section 4. Implementation of the required mitigation measures (Mitigation Measures AIR-1, AIR-2, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, BIO-9, BIO-10, BIO-11, BIO- 12, BIO-13, BIO-14, NOISE-1, and TCR-1) would reduce these potential impacts to a less-thansignificant level. Potential adverse project impacts to cultural resources and Tribal Cultural Resources are addressed in Section 5 and 18 to ensure that cultural or archaeological resources are protected if unearthed during ground disturbing activities (Mitigation Measure TCR-1). Implementation of the required mitigation measure would reduce any potential impacts to a less-than-significant level. Significance Level: Less than Significant Impact.”

**This is way late in the development process.** This should have occurred in 2021. The owner has probably already done significant damage. **Doing this now does not make it better.**

Expressing the need for these reviews and oversight only shows the significant damage that can be done by **un-permitted development.**  
**It can not be rewarded by turning a blind eye.**

“No project impacts have been identified in this Initial Study that are individually limited but cumulatively considerable. The project would contribute to impacts related to air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise and traffic, which may be cumulative off-site, but mitigations would reduce project impacts to less-than-significant levels.”

This project is out of place for so many reasons. Hopefully, I have enumerated most of them. This is exactly the type of development that the Williamson Act tried to regulate. It even allows commercial development by stretching a farm towards commercial uses, **but in very limited ways.**

First, you have to be a farm. This one was a cattle ranch. It qualified for a Type 2 contract for low yield farm land. It has a limited amount of water available for any use.

The new owners wanted an Event Center, boldly announcing the facts all over social media. An in-your-face action if ever there was one. They hurried through an un-permitted, deviously conceived building project to have a wedding party. Many dollars later, they received notice that this was not allowed. Four citations were issued covering about every phase of the construction project. Now, with some very handy cut-and-paste details garnered from the county websites, this is now a lavender farm. The details provided by the owner actually prove otherwise:

No distillation in the new building.

Eleven acres of lavender planted, only two harvested acres.

Three times the water use for the landscaping and events over the farm use.

They state that the farming is not profitable, but they have yet to start. If you do the math on the farm vs the Events, it's two acres of lavender that could possibly produce up to \$30,000-\$60,000 per year and 28 events at \$50,000 piece.

**Which one is primary?**

**If it comes to drying flowers in the main event room or hosting a \$50K party, which one takes precedence?**

The Williamson Act provided for farm sales and product processing and even limited farm visits, 2-4 every two years. None of that would require a use permit.

This is all about the Event Center.

If they are going to be farming, when do they start? What are they waiting for? After they get the Use permit to alter a project they have yet to begin? With the lack of credibility this owner has generated during this process, issuing this use permit is ill advised. The precedent that would be set by allowing this to proceed will bring on more and more of this non-permitted activity. One would question the motivation for approving such a egregious affront to the rules we all agree to abide by.



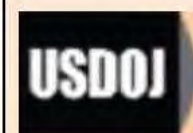
Hitting

FPts FP/G AB H R IB 2B 3B HR RBI BB IBB SO SB CS HBP GDP GV

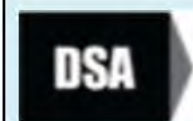
MLB Injury Report - Tatis Jr. to hav... (Jul 16)

MLB Injury Report - All Star Game to be... (Jul 16)

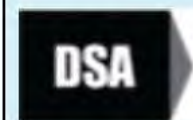




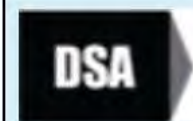
**Advisory 11B-206.2.3 Multi-story buildings and facilities.** Spaces and elements located on a level not required to be served by an accessible route must fully comply with this chapter. While a mezzanine may be a change in level, it is not a story. If an accessible route is required to connect stories within a building or facility, the accessible route must serve all mezzanines. ■



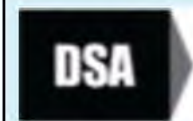
**Advisory 11B-206.2.3 Multi-story buildings and facilities Exception 1.1.** Elevators are the most common way to provide access in multistory office buildings. An exception is provided to the access requirement when office buildings are less than three stories in height or have fewer than 3000 square feet (sf) on every floor. For example, a 3-story office building with 4500 sf on the first floor, 2500 sf on the second floor and 1500 sf on the third floor would not qualify for the exception because one of the three floors is not less than 3000 sf. ■



**Advisory 11B-206.2.3 Multi-story buildings and facilities Exceptions 1.1 and 1.2.** Exceptions 1.1 and 1.2 are only available to privately-funded buildings and do not include a waiver of all other access features required on upper or lower floors. In other words the exception is only for the elevator; everything else must comply. Many people with non-mobility (for example sight or hearing impairments) or semi-ambulatory conditions are served by the remaining access features required by this code. Many wheelchair users can get to upper floors through the use of crutches and other assistance, and can use their wheelchair brought to that floor where access to accessible restrooms, hallways, and accommodations are important. ■



**Advisory 11B-206.2.3 Multi-story buildings and facilities Exception 1.2.** What is a reasonable portion? Typically, one of each type of accommodation and functional space that is normally sought or used by the general public which is provided on inaccessible floors must be provided on the ground floor or an accessible floor; for example, equivalent meeting rooms, classrooms, etc. ■



**Advisory 11B-206.2.3 Multi-story buildings and facilities Exception 1.2.** In facilities that house a shopping center or shopping mall, or a professional office of a health care provider on an accessible

Permit Sonoma

Re: Transportation Impact Study For Villa Santa Event Center

I am commenting on the study provided for this project. The report shows average daily proposed usage and comments on the amount of traffic observed on D Street on "peak" hours. It attempts to address the increase of 180 trips per day during Event Center operation.

First of all, the employee trip configuration is underestimated. It does not include the catering and food and other maintenance services being proposed for these events. All food prep is proposed to be done off-site with constant delivery and the ongoing servicing of sanitation units was not included. What else did they leave out?

More egregious is the fact that the 180 (more like 200) arrivals will happen, not throughout the day, but all at once. There will be a minimum of 100 vehicles heading west on D Street, turning left into oncoming traffic, with no turn lane, during a 1-1.5 hour period, not averaged throughout the day. That equals major congestion.

That leaves the other 100 vehicles arriving from the east, but they are not coming from Point Reyes. They are coming from Marin, exiting Hwy 101 North at San Antonio Rd, traveling 5 miles down San Antonio Rd and turning right onto D Street, in the same 1-1.5 hour period.

This will be a **major** impact on San Antonio Rd. This roadway is in disrepair at this time, with no shoulders and it is crumbling to less than adequate width in numerous places. There is a history of vehicular accidents on this road due to bad road conditions and increased traffic.

The report also does not include the increase traffic that will result on I Street, as the local traffic will seek to avoid the new congestion created on D Street by introducing 200 new vehicles during a 1-1.5 hour window, on the weekend, twice a day during these events.

The study also states there is no history of accidents on this section of D Street.. That is because there is no current traffic obstacles, such as the one this study was supposed to address. If you introduce new conditions, new behavior will result. This is shockingly inadequate.

Someone at Permit Sonoma should actually read these with some sort of critical view. Just accepting the report as factual because it was commissioned, is the wrong thing to do. It does not serve the people of Sonoma County.

This study should be rejected due to its myopic view of the situation at hand. This study started with the desired result and worked backwards in assembling the "facts" to paint a very distorted picture.

William Byrne  
707-972-6167





Ragghianti|Freitas LLP

Attorneys at Law

1101 5<sup>th</sup> Avenue, Suite 100  
San Rafael, CA 94901  
telephone 415.453.9433  
facsimile 415.453.8269  
www.rflawllp.com

Riley F. Hurd III  
rhurd@rflawllp.com

January 31, 2025

Via E-Mail Only

Joshua Miranda  
Planner III  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

**Re: 4485 D Street, Petaluma (APN 020-130-037);  
UPE21-0064; PLP24-0012**

Dear Mr. Miranda:

This office continues to represent Mario and Katherine Ghilotti ("Applicants") in connection with their application for a Zoning Permit for farm retail sales, small-scale agricultural processing of lavender, and a Use Permit to allow special events to promote the farm's products ("Project"). This application was first submitted to the County on December 9, 2021, and determined to be complete for processing in November 2022, yet years later, a hearing for the Project has yet to occur. This delay has results in significant damages for the Applicants, violates their rights to due process, and violates numerous legal processing deadlines.

Throughout this 4-year saga, there has been an endless stream of requests for additional information, delays, continued hearings, and a general failure to advance the project. This treatment is impossible to reconcile with two other very similar projects that have recently been processed to completion by the County.

The purpose of this letter is to request that a hearing be held immediately for the Project.



## Ragghianti|Freitas LLP

Page 2 of 4

### **Chronology of Project Application**

The below is a compilation of key milestones and events in the processing of this application. In between these major points were 100's and 100's of emails, calls, and communications all in an effort to advance the Project:

- **November 22, 2022.** The application was deemed complete for processing.
- **February 9, 2023.** The CUP application is complete with CEQA approval.
- **July 31, 2023.** County requests additional information about the Project's operations from Applicants.
- **March 21, 2024.** In response to request for clarifications, Applicants provide executive summary of Project's operations and supplemental narratives for Use Permit.
- **July 5, 2024- August 5, 2024.** Mitigated Negative Declaration ("MND") for the Project is circulated for public review.
- **July 25, 2024.** County asserts potential need for additional analysis of the MND in response to letters from the Department of Conservation and Water Resources Control Board. Notice of cancellation of BZA hearing scheduled for August 22, 2024.
- **December 9, 2024.** Notice of cancellation of BZA Hearing scheduled for December 12, 2024.
- **December 12, 2024.** BZA continued item to date and time uncertain.
- **January 13, 2025.** Notice of rescheduled BZA hearing to January 23, 2025.
- **January 21, 2025.** Notice of cancelled BZA hearing due to failure to provide email notice to interested parties.
- **January 23, 2025.** BZA continues hearing to date uncertain, not next available date.

### **The Permit Streamlining Act**

Enacted in 1977, the Permit Streamlining Act, California Government Code 65920 *et seq* ("the Act") was intended to expedite local governmental processing of permits for development projects.<sup>1</sup> The Act establishes a set of uniform processes and requires local governmental agencies to follow a standardized process in acting on local land use

---

<sup>1</sup> California Government Code §65920 *et seq*.



## Ragghianti|Freitas LLP

Page 3 of 4

approvals. It establishes time limits within which state and local governmental agencies must either approve or disapprove permits, and provides a route for applicants to have their projects “deemed approved” by operation of law assuming compliance with specified notification procedures.

Under the Act, once an applicant for a local land use entitlement submits a complete permit application, a local agency has 30 days within which to inform the applicant whether or not the application is complete. If the local agency fails to respond within the 30-day period, the application is “deemed complete.” Applicants submitted a Transportation Impact Study, Cultural Resources Study and Hydrogeologic Assessment Report as part of their application, the final report being submitted on October 5, 2022. Under California Government Code 65943, the 30 day period that the County had to issue a written determination regarding application completeness began on October 5, 2022. The County did not provide a written completeness determination and the application was deemed complete by operation of law as of November 5, 2022.

Additionally, following the deemed completeness of the application, the County had 30 days under 14 California Code of Regulations section 15102, to prepare an Initial Study and determine what level of environmental review was appropriate for the Project. **The Initial Study was required to be completed no later than December 6, 2022**, and the County did not meet that deadline. In fact, the Initial Study/Mitigated Negative Declaration was not published for comment until July 2024 and has yet to be adopted five months following the close of the comment period.

### **Delay Violates Applicants’ Right to Due Process**

State law requires notice and a timely opportunity to be heard at a public hearing for adjudicatory proceedings such as conditional use permits. (Cal. Government Code section 65905.) Due process principles require reasonable notice and an opportunity to be heard prior to the deprivation of a significant property interest. (*Horn v. County of Ventura* (1979) 24 Cal.3d 605, 616; see also *Mathews v. Eldridge* (1976) 424 U.S. 319, 333, “The fundamental requirement of due process is the opportunity to be heard ‘**at a meaningful time** and in a meaningful manner.’” (citations omitted).)

The chronology above demonstrates the County’s extreme and unreasonable delay in holding a hearing on the Project. Despite finding the applications complete over two years ago, the County repeatedly asked for additional information from the Applicants, failed to hold a hearing, treated and processed the application different than other



## Ragghianti|Freitas LLP

Page 4 of 4

applications for a similar use, and prioritized unfounded neighbor complaints over the applicant's rights.

Each time the applicants submitted supplemental information or studies, the County would subsequently request additional clarification of the new information provided. The County pursued this pattern and tactic as recently as January 2025. It is this pattern of delay under the guise of continuous information-gathering that the Act and the right to due process specifically seek to prevent. This delay in conducting the hearing is a due process violation and constitutes a constructive and unlawful denial of our clients' right to be heard.

We request that this item immediately be set for the next available public hearing date and approved in accordance with the recommendations of staff.

Thank you.

Very truly yours,

A handwritten signature in blue ink that reads "Riley F. Hurd III". The signature is written in a cursive, flowing style.

Riley F. Hurd III

CC: Client

**From:** [Hannah Spencer](#)  
**To:** [Hannah Spencer](#); [Joshua Miranda](#)  
**Subject:** FW: PLP24-0012 - public comment  
**Date:** Monday, February 3, 2025 9:15:43 AM

---

-

---

**From:** Mario Ghilotti <[mario@vero-west.com](mailto:mario@vero-west.com)>  
**Sent:** Thursday, January 23, 2025 8:12:44 PM  
**To:** Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; David Rabbitt <[David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)>; Andrea Krout <[Andrea.Krout@sonoma-county.org](mailto:Andrea.Krout@sonoma-county.org)>; Riley Hurd <[rhurd@rflawllp.com](mailto:rhurd@rflawllp.com)>; Dayna Ghirardelli <[dayna@sonomafb.org](mailto:dayna@sonomafb.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>  
**Subject:** PLP24-0012

-

**EXTERNAL**

Hello.

-

I had a BZA hearing scheduled for today that was canceled two days ago because of a staff noticing an error. I communicated with staff to push my hearing to the next immediate hearing date, February 13th. A neighbor submitted a public comment that they would not be able to attend my hearing on the 13th.

-

Today, staff asked the BZA to continue my hearing to an unknown date past the 13th to accommodate this neighbor.

-

In agenda item 2, the BZA spent some time discussing that they do not have the authority to influence hearing dates, yet the exact opposite happened for my item.

-

Can County Counsel please clarify if the BZA has the authority to push a hearing date to accommodate a third-party individual?

-

My hearing has been delayed many times, and I'm unaware of any law that allows the accommodation of other third-party schedules. This can be an endless delay tactic by the opposition. My due process rights have been violated, and if Counsel believes I can have my hearing on 2/13, I would like it moved back to that date. There is plenty of time to notice for 2/13.

-

My application was submitted on 12/9/21.

-

-

**Mario Ghilotti**  
**VERO WEST INC.**  
C: (415) 760-1936

E: [mario@vero-west.com](mailto:mario@vero-west.com)

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,  
do not click any web links, attachments, and never give out your user ID or password.

**From:** [Robert Bailey](#)  
**To:** [Joshua Miranda](#)  
**Cc:** [david@davidrabbitt.com](mailto:david@davidrabbitt.com)  
**Subject:** Villa Vanto Farm project  
**Date:** Monday, February 10, 2025 4:58:25 PM

---

## EXTERNAL

I live on D Street and am a bicyclist.

I strongly oppose the proposed project to create an event center at Villa Vanto Farm.

Firstly, the project proposes up to 28 “annual agriculture promotional events” per year “to promote the lavender agricultural processing and other products” including weddings.

Weddings are not, in my view, “agricultural promotional events” so the application is misleading, to say the least.

Second, D Street is currently strongly impacted by large amounts of traffic, including large trucks. The City’s proposal for bike lanes, now under trial, is being protested. One of the main reasons for the opposition is because of traffic. This project will only increase traffic, which is not identified in the impact report.

Third, D Street and the D Street extension are frequently used by bicyclists, including this writer. Any additional vehicle traffic only poses more risk to bicyclists.

For these reasons, ask that the County reject the proposal for this project.

Robert Bailey  
915 D Street, Petaluma, CA 94952  
[rhbailey@sonic.net](mailto:rhbailey@sonic.net)  
Tel: 707-480-8445

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don’t know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.



Thank you for drawing attention to the illegal development occurring on D Street Petaluma. Mr Ghilotti scammed Permit Sonoma on an Ag Exempt permit (no inspections) so he could build an Event Center, not the hay barn for which he applied.

He signed several County documents acknowledging the major restrictions placed on an Ag Exempt permit. He signed a County document verifying no need for a grading permit. He violated all of that. It was intentional.

Now, he says "Mea Culpa". It was more like a "F--- You"

Now, the architect has modified their website portrayal of the building from their originally featured Premiere Event Center to a multi-use barn. How convenient.

Now, Mr Ghilotti is trying to stretch this "Farm Condom" over what is a serious Williamson Act breach of contract and **it doesn't fit.**

Permit Sonoma mishandled the breach of contract protocols established by law ([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=51250.&lawCode=GOV](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51250.&lawCode=GOV)).

**Permit Sonoma did nothing that was specified and required by the State legislature regarding possible breach of contract. According to every oversight State agency asked, it is the responsibility of the District Supervisor to implement these protocols.**

Permit Sonoma is ushering in this violation as the new way for developers to abuse the system:

Conspire to defraud the County by submitting one set of drawings exempt from review and then building a different structure. Once you get caught, you can ask for forgiveness and avoid all that messy review and inspection stuff.

The pretense of the pretend farm went from specialty cattle and brood-mares to now grazing sheep. First, it is 11.5 acres of lavender, harvesting only 2 acres (what farmer does that?). Now, it is somewhere between 6 and 8 acres depending on what report you read. Now, they are harvesting 15 acres of lavender off-site, which is a major change from the application.

It is supposed to be a working farm with farming as the primary functioning business. There is currently no farm activity AT ALL, but there is an Event Center. I doubt there will be any planting if the Event Center and its 28 parties are denied. It has been several years in development and zero plants, no farm activity. It is such an obvious scam.

When the Event Center construction was red tagged, the building and property were being advertised as a premiere wedding site. No mention of their new lavender farm and olive orchard. Now we see that all of the plants are simply landscaping for the weddings.

Their Use permit has gone through so many alterations it should simply be denied on its lack of clarity. And it should be thoroughly reexamined by all State agencies involved due to Permit Sonoma clearly misrepresenting to these agencies, all of the facts of the existing development violations.

The article says only a few are objecting because of possible noise issues.

Although the noise will definitely be an issue, it is hardly the only problem. Those

objecting include the surrounding property owners and Protect San Antonio Valley members who have invested in their neighboring rural properties. The issues here are too numerous for this article. The consequences of approving this Use permit are vast. Sonoma County has an obligation to uphold the current General Plan objectives.

**From:** [William Byrne](#)  
**To:** [James.Hansen@wildlife.ca.gov](mailto:James.Hansen@wildlife.ca.gov); [Joshua Miranda](#); [Hannah Spencer](#); [Tennis Wick](#); [David Rabbitt](#); [Grundy.Farl@DOC](#)  
**Subject:** RE: Villa Vanto Farm MND Comment  
**Date:** Friday, February 14, 2025 9:13:15 AM

---

## EXTERNAL

James

I am opposing the approval of the Use Permit noted above.

Joshua Miranda has been in contact with you regarding the biological mitigation measures contained in the CEQA document submitted for this project.

There are major problems with this application. All of the 13 listed biological mitigation measures noted do not contain the fact that 80% of this "proposed " disturbance HAS ALREADY OCCURRED. How do you mitigate that?

The applicant has already illegally graded the areas in question. The requirements for this Use Permit have already been abused beyond mitigation.

LSA rules and regulations have been ignored.

How can you grade through a seasonal creek without consequences?

How can you move forward with an application that is already in default?

How do you gauge flora and fauna disturbances that have already occurred and been plowed under?

Please advise.

William Byrne  
707-972-6167

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

William Byrne  
1250 San Antonio Rd  
Petaluma CA 95490

Permit Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Hannah

Re: Department Of Conservation Response letter.

I am making exceptions to many of the assumptions taken here by you to try to legitimize the illegal building at 4485 D Street Petaluma. We all know this was permitted as a hay barn with the plans submitted and approved showing an actual hay barn. Mr Ghilotti use the “no inspection” detail of an Ag Exempt permit to then **build a completely different building**.

This is not a hay barn that had plumbing put in the walls, as he would have everyone believe. It is a conspiracy to defraud the County and the citizens of Sonoma County by submitting one set of plans and using different ones to construct the building.

Call it what you want, but it is not a barn. He lied to Permit Sonoma and he lied to his neighbors.

If Mr Ghilotti wanted a farm, he would be farming right now, no permission needed. This is about property development on a parcel that restricts development. This is all about the wedding parties, 28 events.

No one in the area wants an Event Center.

The Williamson Act says no buildings dedicated to commercial use are to be allowed on the property. The main use here is obviously commercial. Can you dry lavender in it? I am sure you could. You could dry lavender in a shipping container as well. No one is objecting to this building being used as a barn.

You state that the primary use of the building is to process farm product. This is a bold face lie.

The building's obvious use is as an event center. It was designed and built as such. The primary use is commercial and not farm related. The falsehoods being projected on this massive building error to try to comply are in fact not believable.

In my initial meeting with you, you stated that making this project compliant was of utmost importance.

Wait, what?

I thought the primary function of Permit Sonoma was to encourage and support property development in accordance with the approved General Plan.

Protect and preserve.

You are trying to stretch the limitations of the Williamson Act inappropriately in favor of a wealthy developer who broke all of the rules. PS is bending over backwards to approve this disgraceful application instead of upholding the rights and privileges, investments and stewardship of the surrounding property owners, all of whom object to this application.

Why would you do that?

Also to be considered, if this is approved, is that the property tax bill for this project will be five to ten times greater than it is now because of the rampant development being considered.

You are basically asking the residents of Sonoma County to subsidize this enormous property tax bill for Mr Ghilotti's illegal development.

You noted that:

*"The Williamson Act contract requires events are directly related to agricultural education or the promotion or sale of agricultural products produced on the contract land; provided that no event lasts longer than two consecutive days, there are no overnight accommodations, and there is no permanent structure dedicated to event use."*

These are wedding parties, not farm related events, occurring in a commercial building, even if they do hand out sachets.

The farm product is coming from off site.

There is a proposed new development that is described for use as a residence **or other use**.

This is undoubtedly the AirBnB for the weddings.

Your assertions that the amount of property being removed from farming for the Event Center and further development is false. The owner submitted applications and drawings showing expanded spray septic fields, new residence, reflection pond, bridges, event center, ceremonial ares, etc. The area described, along with the required LSA considerations and enhancements to accommodate the wedding parties (expanded entrance, new driveway, parking lots, field parking) clearly is greater than the 5 acres allowed by law.

Nowhere do you address the effects on the current and future local farming activities being restricted by the wedding parties.

There is just too, much wrong here to fix by a decree from Permit Sonoma.

Please advise

William Byrne  
707-972-6167

William Byrne  
1250 San Antonio Rd  
Petaluma CA 94952  
707-972-6167

Monique Wilber  
Conservation Program Support Supervisor  
California Department of Conservation  
Division of Land Resource Protection  
715 P Street, MS 1904  
Sacramento, CA 95814

RE: Initial Study and Proposed Mitigated Negative Declaration for the Villa Vanto Farm Project,  
SCH No.  
2024070225; Permit Sonoma File No. PLP24-0012

Dear Ms. Wilber,  
This is in response to your letter, July 15, 2024 titled

**Initial Study and Proposed Mitigated Negative Declaration for the Villa Vanto Farm Project.**

I would like to address the comments raised in your letter as follows:

Under project attributes, the structure is described as a barn. The applicant did indeed secure a permit to build an AG Exempt hay barn on this property. This requires no inspections from Permit Sonoma. He then proceeded to scam Sonoma County by building **a completely different structure.**

It was designed and advertised on the architect's website as a premiere wedding event center. This elaborate depiction has since been altered to show otherwise, further participating in the deception the property owner has created.

It was never a barn. It is an extravagant two story structure with full-height glass walls, marble bathrooms, Great Hall, etc. You could not drive a tractor into it. It is a 5000 square foot commercial building. That is not allowed on a Williamson Act property.

The only activity on this property in the last three years has been a wedding event in this un-permitted structure. No farming of any kind has occurred in the last three years this project has been under scrutiny. There is no lavender, no sheep or cows, no brood-mares. I doubt there will ever be any plantings at all if they cannot get approval for their parties.

The building will be used primarily for wedding and corporate events: twenty eight weekends a year.

Lavender, if harvesting twice a year, requires 2-3 weeks drying time per harvest. The primary building use is obvious. There is little to no relationship between the farm aspect and the event center. There will, however, be extensive lavender landscaping.

The recent site drawings submitted show the distillation equipment, supposedly featured in the main building, is instead to be housed in a separate structure.

Processing will now occur outside of the main building.

The building will not be used for equipment and machinery storage. It is an event center, not a barn. Of the 5000+ square feet available in the building, less than 500 square feet are dedicated to farm use.

The applicant is now harvesting lavender off-site, 15 acres. The lavender on site is apparently only landscaping. These events are not agricultural promotions. Clearly, the applicant is promoting wedding events. The events were extravagantly advertised. No mention of the farm...

This project will remove in excess of five acres from farm use. The original application for the AG Exempt barn submitted to Permit Sonoma stated that the access roads to the site were more than sufficient. But the Event Center, operating as a commercial activity, requires greater emergency access, hence the new road.

The enhanced driveway and proposed new entrance removes over two acres.

The parking lot for 180-200 vehicles removes one acre.

I have attached the drawing the applicant submitted showing the event center, reflection pond and surrounding landscaping, a series of spray septic fields for a twelve bedroom-sized septic system and a proposed new residence. All of this will be removed from farm production. The area is over 5 acres and cannot be parsed otherwise into rotated uses. If designed and proposed for dedicated use, it must be assumed to be used in its full capacity.

I am also concerned that this type of facility will constrain future farm use and activity in the surrounding area. Are surrounding farms going to be restricted from current and future farming activities because there is a wedding happening nearby?

Farms make loud noise, create dust and odd smells, and generate insects in large quantities. Wedding events are not compatible.

The CEQA document submitted has an enormous list of onsite inspections and preservation measures necessary for initiating this construction. Permit Sonoma neglected to inform the State agencies involved that the ground disturbance and grading to be observed and directed has ALREADY been completed. You cannot mitigate existing violations. This is not addressed anywhere in the CEQA document or the narrative presented by the applicant or Permit Sonoma.

There are many noted restrictions and assumptions regarding this Use Permit, and Permit Sonoma and Sonoma County do not inspect or regulate private activities once permitted. They expect compliance. The applicant has undeniably lied and cheated his way through the development process to this point. Trusting him further would be ill advised. His attempts to normalize his previous errors through further deception should not be rewarded.

If he wants a farm, more power to him. I would be very supportive. Unfortunately, they want to compromise the entire agricultural area with their commercial enterprise.

Who is going to regulate the number and size of these events and the resulting noise and congestion? The submitted traffic study is insufficient.

Why is the product so necessary for the farm experience being grown and harvested off-site?

Why can this applicant remove more than the allowed 5 acres from farm use?

Who is really going to believe all of this concocted story line?

If approved, this is destined to become the blueprint for wealthy developers to game the system. Precedence will be set. This applicant is asking for forgiveness because he was warned he would not get permission. He did it anyway. Now Permit Sonoma is making it happen regardless of the malfeasance being committed.



SEPTIC SYSTEM PLAN

Graphic Scale: 1" = 60'

0' 30' 60' 120' 180'

PROPOSED RESERVE SEPTIC AREA

PROPOSED RESERVE SEPTIC AREA

PROPOSED PRIMARY SEPTIC AREA

AREA 1

AREA 2

AREA 3

PROPOSED NEW WELL LOCATION

100' SETBACK TO WELL

POND

BARN

PROPOSED DRIVEWAY

PROPOSED RESIDENCE

**From:** [William Byrne](#)  
**To:** [Hannah Spencer](#); [Joshua Miranda](#); [Tennis Wick](#); [David Rabbitt](#); [Grundy, Earl@DOC](#)  
**Subject:** PS Response Letter to the Department of Conservation  
**Date:** Tuesday, February 18, 2025 7:19:17 AM

---

## EXTERNAL

It seems that each paragraph in this letter falsely describes the reality on the ground here:

"Policy AR-6f states that local concentrations of visitor serving and recreational uses, and agricultural support uses, even if related to surrounding agricultural activities, are detrimental to the primary use of the land for the production of food, fiber and plant materials and shall be avoided. Staff determined the proposed project would not constitute a detrimental concentration of visitor serving uses as the project would not result in joint road access conflicts or in traffic levels that exceed the Circulation and Transit Element's objectives for level of service on a site specific and cumulative basis. A traffic study was provided by W-Trans and accepted by Sonoma County Public Infrastructure and conditions of approval were provided to ensure this project remains in compliance with the traffic study findings.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [William Byrne](#)  
**To:** [Hannah Spencer](#); [Joshua Miranda](#); [Tennis Wick](#); [David Rabbitt](#); [Grundy, Farl@DOC](#)  
**Subject:** PS Response Letter to the Department of Conservation  
**Date:** Wednesday, February 19, 2025 6:23:43 AM

---

## EXTERNAL

It seems that each paragraph in this letter falsely describes the reality on the ground:

"Policy AR-6f states that local concentrations of visitor serving and recreational uses, and agricultural support uses, even if related to surrounding agricultural activities, are detrimental to the primary use of the land for the production of food, fiber and plant materials and shall be avoided. Staff determined the proposed project would not constitute a detrimental concentration of visitor serving uses as the project would not result in joint road access conflicts or in traffic levels that exceed the Circulation and Transit Element's objectives for level of service on a site specific and cumulative basis. A traffic study was provided by W-Trans and accepted by Sonoma County Public Infrastructure and conditions of approval were provided to ensure this project remains in compliance with the traffic study findings."

The traffic study ignores the traffic flow that will occur on San Antonio Rd and I Street as a result of introducing an unusually large amount of vehicles onto D Street in a short time period on every weekend of prime tourist season.

Why was this aspect left out?

Why was this aspect not questioned?

Accepting submitted documents and studies without further review is unacceptable. I have noted this to have happened on several occasions by Permit Sonoma.

Neither route was included in the study. Traffic navigation Apps direct traffic along these roads as an optional route or suggested route during high traffic times to the proposed location. These events will only occur during high traffic times. Both of these roads are in exceptionally poor condition and have a serious traffic accident history when traffic on these roads increases due to external factors, like accidents and traffic congestion. Accepting this study is a serious mistake.

"Additionally, the project will not be detrimental to the rural character of the area as the proposed uses will not result in significant traffic, visual, noise, or water impacts. The project site borders D Street and is surrounded by lands devoted to grazing and rural residential development. The rural character of the property will be maintained as there are no new structures proposed, 88% of the 56-acre property will be devoted to agricultural production, and construction of the new access road would result in minimal loss of grazing land."

This statement is just not true. All of the surrounding property owners are invested in and stewards of their very rural environment. Adding an Event Center into the middle of this is contradictory to this land use and violates all aspects of the General Plan. The applicant stated in the Press Democrat that the neighbors "will get used to it." The neighbors do not want to get used to it! They want a level playing field in regards to zoning and area development. They invested here based on the General Plan Sonoma development is supposed to abide by. And they are tired of the constant misinformation being presented by the applicant.

The entitled property owners here rightfully expect the governance of their County to be in line with the existing General Plan, not some future idea that is yet to be vetted. The submitted drawings clearly show additional development being proposed and supported by Permit Sonoma:

- Further Event site construction,
- Stream alterations requiring a CDFW Lake and Stream Alteration Agreement
- A 12 bedroom-sized septic system to service the new and future construction
- Construction of an additional residence that is open to being a future AirBnB rental.

As I have stated in other submitted documents, the enhanced entrance and expansive driveway are only required for the Event Center operations, not for farming. **The applicant**

**has already stated in documents submitted to Permit Sonoma, when he submitted plans to build a barn, that the existing roads were adequate to service the "barn" area usage. At that time, Permit Sonoma agreed with that assessment.**

**DOC comment regarding Project Considerations:** *Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.*

**Permit Sonoma Response:** Properties within vicinity of the project are subject to Sonoma County's agricultural zoning and land use policies that limit the types and sizes of non-agricultural land uses and residential density. Agricultural production, agricultural processing, farm retail, and agricultural promotional events are identified as permitted uses by the General Plan agricultural policies and Zoning Code, subject to required zoning and use permit approval and environmental review. Therefore, provided the applicant obtains the necessary permitting, the proposed project is not expected to result in potentially significant cumulative impacts on agricultural land.

I feel at times that we are talking about different Use Permit applications. The incremental impacts are already happening:

---The piles of dirt from non-permitted grading of the hillside two years ago.

---Run off from the illegal grading into San Antonio Creek tributaries

---The original illegal grading that now requires thirteen different biological inspections and monitoring, except that **most of the ground disturbance has already occurred. How do you mitigate that?**

---The retro-fitting of a commercial building from a barn it never was, allowing the lowering of the Wildland-Urban-Interface standards in reverse. A barn does not require fire resistant siding. A commercial building does require WUI standards, and you are ignoring this protective building requirement in some bizarre twist of regulations. Commercial buildings in this area must meet this standard. You are putting lives at risk by this clear deception and omission.

The property tax issue is another cumulative effect. The major development here will increase the property value astronomically. Now that Mr Ghilotti got caught cheating the system, each allowed "improvement" will result in a new basis for tax increases. Every finalized building permit triggers a new property assessment. The amount due in property tax increases every year. The residents of Sonoma County will be subsidizing Mr Ghilotti's deluxe property tax bill in perpetuity.

Again, to be clear, there is no opposition to farming or farm retail sales or any other farming aspect of this property. Zoning clearly allows this. The Williamson Act even allows for 2-4 farm related events per year. Clearly, zoning does not allow for 28 commercial wedding and corporate events. Clearly, these are not farming related activities, except that they would occur on a farm that does not yet exist. This is the issue. We all respect what the zoning allows in the LEA area. Mr Ghilotti clearly does not.

William Byrne  
707-972-6167

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [William Byrne](#)  
**To:** [Joshua Miranda](#); [Tennis Wick](#); [David Rabbitt](#); [Hannah Spencer](#); [Grundy, Earl@DOC](#)  
**Subject:** Ragghianti/Freitas LLP Letter  
**Date:** Wednesday, February 19, 2025 10:47:26 AM

---

## EXTERNAL

I am responding to the letter of support submitted by Mr Ghilotti's hired law firm. It must be odd having to solicit favor through a firm on retainer. This must be a very special client for them to support his bad behavior. The letter skews the facts and makes several statements that can only be viewed as misinformation.

I am sure that the Ghilottis, the law firm's clients, are currently trying to legitimize their illegal attempts to defraud Sonoma County and its tax-paying residents. The problem is that they have arrogantly and intentionally pushed this abuse of the General Plan on the surrounding property owners.

The letter states that the Ghilottis held their own wedding in the event center, that their excitement for their own wedding led to this circumstance, and "Getting excited about your own wedding is not a crime".

What is a crime is conspiring to defraud the county by submitting one set of drawings to secure an AG Exempt permit, and then building a completely different structure. There are two distinct sets of plans. This is not an , "oh by the way I put in some plumbing". It is a completely different structure from the plans submitted. It was featured on the architect's website as the new premiere wedding event center. No mention of a farm. This website has since been altered, once their clients got caught violating most of the rules and regulations governing commercial construction.

What is a crime is continuing construction after the project was red-tagged for four serious violations.

Mr Ghilotti put his subcontractors in serious jeopardy of losing their contractor's licenses by having them continue operations to complete the Event Center so he could hold an illegal gathering in an unpermitted, uninspected building. This speaks to his character.

When confronted about their continued construction activity after the violations were issued, the subcontractors had no answer. Mr Ghilotti then called me in August 2022 to say that he lied to his contractors about having the proper permits and that he lied to them about being red tagged. He then threatened me with litigation. He also continued construction, which is also a crime.

There were no fire prevention measures in place, no event permit. His Ag Exempt permit and Williamson Act provisions totally restricted barn occupancy. He signed several documents acknowledging this. That is also against the law.

What else is a crime is signing a county document, under penalty of perjury, stating that no grading permit was needed. I thought it was Mr Ghilotti's profession to move dirt? A violation was issued for this also.

You state that your clients intended this lavender farm all along, since they purchased the property. Three years into this disgrace, and there is still no plantings of any kind. They also continued illegal grading.

Their attempts to fit the event center under the Williamson Act guidelines amounted to a cut-and-paste of the allowable activities listed on the county website on contracted properties. First it was cattle and brood-mares and 11.5 acres of lavender. Now it's sheep and growing lavender off site. The narrative has changed so much in trying to stretch the "farm condom" around the Event Center that the Use permit should be resubmitted when they decide what kind of farm they actually want. The only constant here is the Event Center.

In August 2022, your client parked 100+ cars in a dry grass field, erected a 30' tall light tower and used an unpermitted building for a wedding event. This total disregard for the area property owners is telling. His behavior suggests he cares only for his own goals. Your statement about realizing the barn would not work for public use caused the Ghilottis to change direction is false.

The Ghilottis used two sets of drawings to scam the county. That is not up for debate. This is a different structure altogether. The only element true for both drawings in the 40' x 50' footprint. Everything from there up is designed and built as an event center, not the barn. Nothing in this building resembles the original drawing submitted to secure a permit. Saying this is just an amended barn drawing is completely false. These are deliberate actions to conceal illegal construction.

As far as "imposing stringent life safety requirements" in the Event Center, the conversion, if approved, would ignore the Wildland-Urban-Interface rules. The barn was built without fire resistant siding. This feature is required of all commercial buildings under the Wildland-Urban-Interface rules for Occupant safety. This is just another example for your clients avoiding all those messy, expensive rules and regulations. So much for enhanced safety... If approved, your client will be responsible for self regulating his Use permit activities. He has proved to be unreliable. So far by his actions he has proved that he is a cheater and he admitted he has lied his way to this point. Ten days ago, when interviewed by the Press Democrat, he continued his misinformation making several statements that he knew to be false.

Your clients have proved to be not believable. Your narrative spells out specific duties the Ghilottis plan to do to legitimize the Event Center. All of it is just a story to recover their Event Center investment.

Make no mistake, this is a plan for a well landscaped wedding center, not a farm needing extra income. They do not need a Use permit to operate as a farm. They do need one to host 28 unregulated non-agricultural events. Providing lavender centerpieces for the weddings is not promoting your farm, especially when it grown elsewhere.

If the Use permit is denied, as it should be, I doubt the Ghilottis will continue with the farm idea. So far, no farm. Only the Event Center.

There is no question that the events are the priority. Water use, Income estimates, property development all favor the wedding parties. The crop is now being grown elsewhere. The land improvements being requested all are in support of the Event Center use. None of it is for facilitating the farm.

Their expanded use also removes over 5 acres from farm production, which is not allowed, and they are scamming the system to avoid that detail.

Your narrative about the continued construction is also not true. He knew what he was doing was illegal and would not be allowed. That he documented the unpermitted construction is irrelevant. He is scrambling now to save himself from his disregard for the rules.

You ask that the county see this request with "fresh eyes", and to "disregard the misplaced speculation". Your client should bear the responsibility of his actions. His lying and cheating is unacceptable behavior. He does not in any way foster confidence or respect. His actions speak louder than his words, and he is not to be trusted.

Sincerely

William Byrne



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

William Byrne  
1250 Sn Antonio Rd  
Petaluma CA 94952

Permit Sonoma  
Joshua Miranda

February 19 2025

RE: Villa Vanto Farm MND Comment

I am responding to the letter of support submitted by Mr Ghilotti's hired law firm. It must be odd having to solicit favor through a firm on retainer. This must be a very special client for them to support his bad behavior. The letter skews the facts and makes several statements that can only be viewed as misinformation.

I am sure that the Ghilottis, the law firm's clients, are currently trying to legitimize their illegal attempts to defraud Sonoma County and its tax-paying residents. The problem is that they have arrogantly and intentionally pushed this abuse of the General Plan on the surrounding property owners.

The letter states that the Ghilottis held their own wedding in the event center, that their excitement for their own wedding led to this circumstance, and "Getting excited about your own wedding is not a crime".

What is a crime is conspiring to defraud the county by submitting one set of drawings to secure an AG Exempt permit, and then building a completely different structure. There are two distinct sets of plans. This is not an , "oh by the way I put in some plumbing". It is a completely different structure from the plans submitted. It was featured on the architect's website as the new premiere wedding event center. No mention of a farm. This website has since been altered, once their clients got caught violating most of the rules and regulations governing commercial construction.

What is a crime is continuing construction after the project was red-tagged for four serious violations.

Mr Ghilotti put his subcontractors in serious jeopardy of losing their contractor's licenses by having them continue operations to complete the Event Center so he could hold an illegal gathering in an un-permitted, un-inspected building. This speaks to his character.

When confronted about their continued construction activity after the violations were issued, the subcontractors had no answer. Mr Ghilotti then called me in August 2022 to say that he lied to his contractors about having the proper permits and that he lied to them about being red tagged. He then threatened me with litigation. He also continued construction, which is also a crime.

There were no fire prevention measures in place, no event permit. His Ag Exempt permit and Williamson Act provisions totally restricted barn occupancy. He signed several documents acknowledging this. That is also against the law.

What else is a crime is signing a county document, under penalty of perjury, stating that no grading permit was needed. I thought it was Mr Ghilotti's profession to move dirt? A violation was issued for this also.

You state that your clients intended this lavender farm all along, since they purchased the property. Three years into this disgrace, and there is still no plantings of any kind. They also continued illegal grading.

Their attempts to fit the event center under the Williamson Act guidelines amounted to a cut-and-paste of the allowable activities listed on the county website on contracted properties. First it was cattle and brood-mares and 11.5 acres of lavender. Now it's sheep and growing lavender off site. The narrative has changed so much in trying to stretch the "farm condom" around the Event Center that the Use permit should be resubmitted when they decide what kind of farm they actually want. The only constant here is the Event Center. In August 2022, your client parked 100+ cars in a dry grass field, erected a 30' tall light tower and used an unpermitted building for a wedding event. This total disregard for the area property owners is telling. His behavior suggests he cares only for his own goals.

Your statement about realizing the barn would not work for public use caused the Ghilottis to change direction is false. The Ghilottis used two sets of drawings to scam the county. That is not up for debate. This is a different structure altogether. The only element true for both drawings in the 40' x 50' footprint. Everything from there up is designed and built as an event center, not the barn. Nothing in this building resembles the original drawing submitted to secure a permit. Saying this is just an amended barn drawing is completely false. These are deliberate actions to conceal illegal construction.

As far as "imposing stringent life safety requirements" in the Event Center, the conversion, if approved, would ignore the Wildland-Urban-Interface rules. The barn was built without fire resistant siding. This feature is required of all commercial buildings under the Wildland-Urban-Interface rules for Occupant safety. This is just another example for your clients avoiding all those messy, expensive rules and regulations. So much for enhanced safety...

If approved, your client will be responsible for self regulating his Use permit activities. He has proved to be unreliable. So far by his actions he has proved that he is a cheater and he admitted he has lied his way to this point. Ten days ago, when interviewed by the Press Democrat, he continued his misinformation making several statements that he knew to be false.

Your clients have proved to be not believable. Your narrative spells out specific duties the Ghilottis plan to do to legitimize the Event Center. All of it is just a story to recover their Event Center investment.

Make no mistake, this is a plan for a well landscaped wedding center, not a farm needing extra income. They do not need a Use permit to operate as a farm. They do need one to host 28 unregulated non-agricultural events. Providing lavender centerpieces for the weddings is not promoting your farm, especially when it grown elsewhere.

If the Use permit is denied, as it should be, I doubt that the Ghilottis will continue with the farm idea. So far, no farm. Only the Event Center.

There is no question that the events are the priority. Water use, Income estimates, property development all favor the wedding parties. The crop is now being grown elsewhere. The land improvements being requested all are in support of the Event Center use. None of it is for facilitating the farm.

Their expanded use also removes over 5 acres from farm production, which is not allowed, and they are scamming the system to avoid that detail.

Your narrative about the continued construction is also not true. He knew what he was doing was illegal and would not be allowed. That he documented the unpermitted construction is irrelevant. He is scrambling now to save himself from his disregard for the rules.

You ask that the county see this request with "fresh eyes", and to "disregard the misplaced speculation". Your client should bear the responsibility of his actions. His lying and cheating is unacceptable behavior. He does not in any way foster confidence or respect. His actions speak louder than his words, and he is not to be trusted.

Sincerely

William Byrne



Ragghianti|Freitas LLP

Attorneys at Law

1101 5<sup>th</sup> Avenue, Suite 100  
San Rafael, CA 94901  
telephone 415.453.9433  
facsimile 415.453.8269  
www.rflawllp.com

Riley F. Hurd III  
rhurd@rflawllp.com

January 31, 2025

Via E-Mail Only

Joshua Miranda  
Planner III  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

**Re: 4485 D Street, Petaluma (APN 020-130-037);  
UPE21-0064; PLP24-0012**

Dear Mr. Miranda:

This office continues to represent Mario and Katherine Ghilotti ("Applicants") in connection with their application for a Zoning Permit for farm retail sales, small-scale agricultural processing of lavender, and a Use Permit to allow special events to promote the farm's products ("Project"). This application was first submitted to the County on December 9, 2021, and determined to be complete for processing in November 2022, yet years later, a hearing for the Project has yet to occur. This delay has results in significant damages for the Applicants, violates their rights to due process, and violates numerous legal processing deadlines.

Throughout this 4-year saga, there has been an endless stream of requests for additional information, delays, continued hearings, and a general failure to advance the project. This treatment is impossible to reconcile with two other very similar projects that have recently been processed to completion by the County.

The purpose of this letter is to request that a hearing be held immediately for the Project.



## Ragghianti|Freitas LLP

Page 2 of 4

### **Chronology of Project Application**

The below is a compilation of key milestones and events in the processing of this application. In between these major points were 100's and 100's of emails, calls, and communications all in an effort to advance the Project:

- **November 22, 2022.** The application was deemed complete for processing.
- **February 9, 2023.** The CUP application is complete with CEQA approval.
- **July 31, 2023.** County requests additional information about the Project's operations from Applicants.
- **March 21, 2024.** In response to request for clarifications, Applicants provide executive summary of Project's operations and supplemental narratives for Use Permit.
- **July 5, 2024- August 5, 2024.** Mitigated Negative Declaration ("MND") for the Project is circulated for public review.
- **July 25, 2024.** County asserts potential need for additional analysis of the MND in response to letters from the Department of Conservation and Water Resources Control Board. Notice of cancellation of BZA hearing scheduled for August 22, 2024.
- **December 9, 2024.** Notice of cancellation of BZA Hearing scheduled for December 12, 2024.
- **December 12, 2024.** BZA continued item to date and time uncertain.
- **January 13, 2025.** Notice of rescheduled BZA hearing to January 23, 2025.
- **January 21, 2025.** Notice of cancelled BZA hearing due to failure to provide email notice to interested parties.
- **January 23, 2025.** BZA continues hearing to date uncertain, not next available date.

### **The Permit Streamlining Act**

Enacted in 1977, the Permit Streamlining Act, California Government Code 65920 *et seq* ("the Act") was intended to expedite local governmental processing of permits for development projects.<sup>1</sup> The Act establishes a set of uniform processes and requires local governmental agencies to follow a standardized process in acting on local land use

---

<sup>1</sup> California Government Code §65920 *et seq*.





## Ragghianti|Freitas LLP

Page 3 of 4

approvals. It establishes time limits within which state and local governmental agencies must either approve or disapprove permits, and provides a route for applicants to have their projects “deemed approved” by operation of law assuming compliance with specified notification procedures.

Under the Act, once an applicant for a local land use entitlement submits a complete permit application, a local agency has 30 days within which to inform the applicant whether or not the application is complete. If the local agency fails to respond within the 30-day period, the application is “deemed complete.” Applicants submitted a Transportation Impact Study, Cultural Resources Study and Hydrogeologic Assessment Report as part of their application, the final report being submitted on October 5, 2022. Under California Government Code 65943, the 30 day period that the County had to issue a written determination regarding application completeness began on October 5, 2022. The County did not provide a written completeness determination and the application was deemed complete by operation of law as of November 5, 2022.

Additionally, following the deemed completeness of the application, the County had 30 days under 14 California Code of Regulations section 15102, to prepare an Initial Study and determine what level of environmental review was appropriate for the Project. **The Initial Study was required to be completed no later than December 6, 2022**, and the County did not meet that deadline. In fact, the Initial Study/Mitigated Negative Declaration was not published for comment until July 2024 and has yet to be adopted five months following the close of the comment period.

### **Delay Violates Applicants’ Right to Due Process**

State law requires notice and a timely opportunity to be heard at a public hearing for adjudicatory proceedings such as conditional use permits. (Cal. Government Code section 65905.) Due process principles require reasonable notice and an opportunity to be heard prior to the deprivation of a significant property interest. (*Horn v. County of Ventura* (1979) 24 Cal.3d 605, 616; see also *Mathews v. Eldridge* (1976) 424 U.S. 319, 333, “The fundamental requirement of due process is the opportunity to be heard ‘**at a meaningful time** and in a meaningful manner.’” (citations omitted).)

The chronology above demonstrates the County’s extreme and unreasonable delay in holding a hearing on the Project. Despite finding the applications complete over two years ago, the County repeatedly asked for additional information from the Applicants, failed to hold a hearing, treated and processed the application different than other



Ragghianti|Freitas LLP

Page 4 of 4

applications for a similar use, and prioritized unfounded neighbor complaints over the applicant's rights.

Each time the applicants submitted supplemental information or studies, the County would subsequently request additional clarification of the new information provided. The County pursued this pattern and tactic as recently as January 2025. It is this pattern of delay under the guise of continuous information-gathering that the Act and the right to due process specifically seek to prevent. This delay in conducting the hearing is a due process violation and constitutes a constructive and unlawful denial of our clients' right to be heard.

We request that this item immediately be set for the next available public hearing date and approved in accordance with the recommendations of staff.

Thank you.

Very truly yours,

Riley F. Hurd III

CC: Client



Ragghianti|Freitas LLP

Attorneys at Law

1101 5<sup>th</sup> Avenue, Suite 100  
San Rafael, CA 94901  
telephone 415.453.9433  
facsimile 415.453.8269  
www.rflawllp.com

Riley F. Hurd III  
rhurd@rflawllp.com

April 29, 2022

**Via E-Mail Only**

Tennis Wick  
Permits Sonoma Director  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Eduardo Hernandez  
Planner III  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

David Rabbitt  
Supervisor, District 2  
Sonoma County Board of Supervisors  
575 Administration Drive  
Room 100 A  
Santa Rosa, CA 95403

**Re: 4485 D Street, Petaluma (APN 020-130-037);  
Use Permit Application UPE21-0064**

Dear Mr. Wick:

This office represents Mario Ghilotti and Katherine Aycock in connection with their application for a use permit to allow small-scale agricultural processing of lavender and farm retail sales at their property located at 4485 D Street in Petaluma. The application also seeks up to 28 special events per year to promote, market, and showcase the lavender-based agricultural products proposed to be grown and produced on site. These promotional and marketing events are a critical component to making this agricultural operation financially viable. Simply put, smaller-scale agriculture is a very tough business these days. Every possible sales channel must be utilized for a chance at success. This includes direct-to-consumer, third-party retail, and on-site events and sales. Sonoma County has a vast amount of agriculturally zoned land, with fewer and fewer operators outside of the wine and cannabis markets, yet agriculture remains the central goal of this particular zoning district. For this goal to be met, the financial realities of agriculture in today's economic climate must be acknowledged, and all marketing channels supported.



## Ragghianti|Freitas LLP

Page 2 of 8

On March 28, 2022, a group of San Antonio Valley residents, who refer to themselves as “Protect San Antonio Valley,” submitted a lengthy letter (“Letter”) expressing opposition to this application on the basis that the lavender production is not the primary use for the site, and that the buildings are primarily intended to support special events, which would therefore be incompatible with the Williamson Act and the Sonoma County General Plan policies and applicable zoning. The Letter contains numerous factual misrepresentations and speculations as to our clients’ intentions for the property, thereby necessitating this response.

As set forth in greater detail in the use permit application materials and submittals, our clients are legitimately and in good faith seeking to obtain entitlements for a primarily agricultural use that is completely consistent with applicable zoning, General Plan and Williamson Act policies. The special events will be secondary to, and fully compatible with, the primary agricultural use of the property, and are properly characterized as “visitor serving uses” that will promote the agricultural activities and small-scale production that is proposed. Furthermore, as a part of their use permit application, our clients are seeking retroactive building permit approval for their barn for an occupancy type that is appropriate to its anticipated use as a facility that will occasionally be used for restricted non-agricultural uses in the Land Extensive Agriculture (“LEA”) zone.

### Discussion

The opponents Letter makes much of the fact that the barn constructed on site pursuant to a 2021 AG exempt permit (“the Barn”) was actively marketed as an event space. Our clients did publish and circulate information through social media regarding the facility’s availability for appropriate visitor serving uses, but to be clear: **to date, our clients have not rented the space for any special event or held any larger public assemblies beyond it serving as a venue for their own 2021 wedding.** All of the photographs that the opponents include in the Letter from social media outlets are of our clients’ own wedding, and are not from any third-party use of the site, as no such use has ever occurred. Getting excited about your own wedding is not a crime.

From early on in their planning, our clients intended the Barn to serve as a space for small scale agricultural processing, with only occasional uses as an event space to aid in promoting the proposed small scale on site agricultural production. As our clients have developed and refined their business model for lavender production, they realized the AG exempt barn permit would not allow public use. Accordingly, in direct response to a suggestion made by Sonoma County Ombudsman Brian Keefer, they have amended the scope of their Use Permit application to seek a retroactive building permit to reclassify the structure under an A2/A3 occupancy, which imposes stringent life safety



## Ragghianti|Freitas LLP

Page 3 of 8

requirements and will support their application for a land use for “periodic special events,” which is an allowable land use in the LEA 60 zone, subject to the discretionary review criteria set forth under Sonoma County Code (“SCC”) Section 26-06-030, Table 6-1.

### General Plan

Under the Land Use Element of the Sonoma County General Plan, the “primary use of any parcel within the LEA designation must be agricultural production and related processing, support services, and visitor serving uses.” Visitor serving uses are permitted within agricultural areas but, under Goal AR-6, are limited in scale and location, and need to be beneficial to the agricultural industry and farm operators and compatible with long term agricultural use of the land. Such uses, under Objective AR-6.1, need to promote agriculture and enhance marketing of Sonoma County agricultural products, while being “secondary and incidental to agricultural production.”

Our clients’ application is completely consistent with these policy objectives. The Barn will house distillation facilities for the substantial lavender crop and serve as a facility to support the “visitor serving uses,” and will allow our clients to actively promote the agricultural products produced on site.

### Zoning

The property is located within the LEA 60 zoning district. Under allowable use regulations as set forth under SCC Section 26.06.030 Table 6.1, “Agricultural Crop Production and Cultivation” is a permitted use, while “Agricultural Processing, Small Scale” and “Periodic Special Events” are permitted uses subject to “discretionary approval criteria.” Small-scale agricultural processing is permissible subject to compliance with performance standards set forth under Section 26-88-210, while “Periodic Special Events,” defined to include “gathering(s) which attract a large gathering of people either by direct participation, or as spectators,” may be approved if they will comply with a set of enumerated standards set forth under Section 26-22-120(c), and the applicant can additionally demonstrate that the proposed events:

- 1) meet a local need;
- 2) avoid conflict with agricultural activities; and
- 3) are consistent with General Plan objectives AR-4.1 and policy AR-4a (which further prioritize avoidance of conflict with agricultural activities, and require that



## Ragghianti|Freitas LLP

Page 4 of 8

the primary use of parcels within the category be for agricultural and related processing, support services and visitor serving uses).

Here too, the proposed uses are completely allowable under applicable regulations. The events (as discussed in greater detail below) will serve to actively promote our clients proposed small scale agricultural production and processing of lavender crops.

### Williamson Act

Under the County's "Uniform Rules for Agricultural Preserves and Farmland Security Zones," ("the Rules"), "Special Events," (whose definition, it is important to note, **expressly includes weddings and wedding receptions**), are allowable under Rules Section 8.3(H) so long as they are "directly related to agricultural education or the promotion or sale of agricultural commodities and products produced on the contracted land, provided that the events last no longer than two consecutive days and that no permanent structure dedicated to the events is constructed or maintained on the parcel."

Rules Section 8.2(B)(8) further requires that "the use not significantly change the character, appearance, or operation of the agricultural or open space uses" of the land.

The opponents' Letter alleges that the construction of the Barn violates section 51250 of the Government Code, which provides that certain structures are "material breaches" of Williamson Act contracts if such structures are both commercial buildings not allowed under the Williamson Act, the Rules or local ordinance, are not related to an agricultural use, and that exceed 2,500 square feet in area. However, with the approval of a retroactive building permit and the issuance of the use permit, the Barn will be clearly related to an agricultural use and expressly permitted under the Williamson Act, the Rules and relevant provisions of the SCC. Under the small-scale permit regulations, parcels five acres or greater may lawfully include 5000 sf small scale agricultural processing facilities. When it is not being used for the permitted special events, the Barn will be used primarily for the small-scale processing of lavender products from crops grown on site.

### The Lavender Farm

Although our clients purchased the property subject to a Williamson Act contract classifying the property as non-prime agricultural land, there was no active agricultural use at the time of purchase. The property was historically used as a dairy, but that ceased some time ago. The property is characterized by steep and hilly terrain which presents a challenge to many types of cultivation. After reviewing their options, our clients arrived at the idea of pursuing cultivation of a drought-resistant crop with low water





## Ragghianti|Freitas LLP

Page 5 of 8

requirements. Their research suggested that the only viable way to produce this commercially in such small production would be to process the lavender to a retail product on site, and to market the product as a locally grown high-end product with an on-site immersive experience.

This agricultural cultivation plan, contrary to the opponents' allegations, is **not** a sham. The proposed operation would include 10 acres of lavender fields planted in rows and upon terraced platforms. They plan to lease an additional 15 acres from other local properties with non-existing AG uses and also process those plants through their small-scale processing center. **This totals 25 planted acres.**

Each acre will produce 6,000 LBS of raw lavender. In one of two harvests per year, they will have 150,000 Lbs. of lavender to process. All these crops will need to be cut at the same time and stored in the Barn. One sack of lavender (3' X 3' X 3') stores an average of 110 LB's. To store 150,000 LBS of lavender our clients will need approximately 1,363 sacks which take up 9 SF each, totaling 12,272 SF. Accordingly, the Barn, when it is not being used for special events, will play a critical role in storing lavender crops once harvested. They will use the remaining areas for a lab, distillation and packing of retail product.

Once planted, two acres of lavender can be expected to yield up to four gallons of lavender oil annually, with a value of approximately \$7,200.

Lavender intermedia generates 60LBS of essential oil or 8.17 gallons. English Lavender generates 2 gallons per acre. Our clients plan to plant the majority of intermedia- for an average of 6 gallons per acre. In addition to the lavender oil they will yield an average of 1500 gallons of hydrosol per acre. These are real numbers, not a sham.

### *The Special Events Support and Promote the Primarily Agricultural Use of the Site*

Following careful market research, our clients have sensibly concluded that the most viable business model is to create an immersive and participatory experience that will bring their prospective customers on site and educate the public as to the benefits of the product and the sustainable water management practices. The following criteria will apply to events at the property:

- All events will include a guide who will demonstrate how the products are taken from harvest through processing.
- Visitors will have the opportunity to create a unique and custom scent using essential oils.
- All events will require guests to purchase products from the farm.



## Ragghianti|Freitas LLP

Page 6 of 8

The intent is to attract prospective customers to the site to directly experience farming practices that protect and conserve environmental air, soil and water quality. Towards this end, the Barn will not simply provide a forum for weddings, but will also showcase and market the lavender oil, educate potential customers as to our clients' products and sustainable, drought-tolerant agricultural practices. While the proposed event schedule includes up to 15 weddings (each of which are actively promotional, and contractually required to include the consumption and showcasing of the farm's products, including an opportunity to purchase products individually and by subscription at the event), there are also 13 events targeted at educational, promotional, fundraising and industry-related events.

Conducting special events directly related to agricultural education and the promotion and sale of agricultural commodities produced on site is completely consistent with the Williamson Act, the General Plan and the SCC. The events are entirely compatible with the primary agricultural use of the property, and meet the requirement that the Barn incidentally support the events. Their operations plan will include shuttle services to decrease traffic impacts and greenhouse gas emissions. But the Barn's primary function will remain the processing and sale of lavender products. The proposed periodic special events prioritize the commercial production and processing of small-scale crops.

While the opponents make much of the apparent discrepancy in revenue between the proposed lavender oil production and use of the Barn for special events, there is nothing under zoning or the General Plan that requires the lavender production to be the primary source of revenue generation. The ordinance and policies require only that any special events be "secondary" to the primary lavender production and actively promote and enhance the on-site agricultural activities. The General Plan requires that the parcel's primary use be agricultural production and related processing, support services and visitor serving uses. And there is simply nothing in the SCC or the General Plan to suggest that the metric for determining a property's primary use is anything other than looking at how the acreage is used. The special event use is periodic and limited to an area of less than one acre on a 57-acre site. The primary use land use on this property will be farming, with the special events carefully managed to actively promote the farm's agricultural products, which is an absolute necessity for the business to survive.

### Building Permit Issues

Our clients originally sought the approval of the AG exempt permit in 2021 to facilitate the construction of the Barn in time for their wedding. As they developed a business and cultivation plan to farm and process lavender on site, however, they realized that they would need to reclassify the structure's occupancy type to accommodate the types of



## Ragghianti|Freitas LLP

Page 7 of 8

special events supporting visitor serving uses. Starting an agricultural business and complying with the myriad of County codes is a very complicated endeavor. They sought advice from the County and are implementing it now.

Accordingly, they have submitted an updated full building package and permit application to reclassify the structure as an A2/ A3 occupancy type. This would support the intended use of the space for restricted non-agricultural uses in the LEA zone. As noted, this retroactive building permit would support periodic special events, **which is an allowed land use in the LEA zone subject to discretionary criteria.**

The retroactive Building Permit submittal reclassifies the Barn as a U,F-2,A-2,A-3 and B occupancy under the California Building Code. Our clients have furnished the Chief Building Official with full as-built drawings and a fully updated plan set to support approval of the updated retroactive building permit under SCC Sec. 7-5. This will allow the Building Department to confirm that the work complies with current code for the structure and proposed occupancy type through a review of as-built drawings and on-site inspection. The plan submittals reflect the dimensions, geometry and locations of structural and MEP elements, and contain documentation enabling the County to perform Energy Calculations, Title 24 and CalGreen certification. When our client realized his processing facility would need power, water, and bathrooms, he went into PRMD building and asked to convert the building application. He was told that the application could not be converted until the building was finalized. The utilities are not active, but in efforts to save considerable funds, they installed part of the routing in the walls and documented that installation extensively with video. He will continue to work cooperatively with County building inspectors to expose pertinent MEP or structural elements, braced wall panels, ducts, wires and pipes, electrical fixtures or other building components as necessary to facilitate inspection.

### Conclusion

We ask that you carefully review this application with fresh eyes, judge it on the merits of the submittal, and disregard the misplaced speculation about our clients' business plan as set forth in the opponents' Letter. Our clients propose a use that is completely consistent with applicable General Plan and zoning requirements, have made appropriate applications to retroactively permit the Barn, and will establish a business whose primary priority is to preserve and enhance the land and groundwater resources with sustainably farmed, drought tolerant and diverse crop plantings. The promotional special events proposed at the farm will meet the need of Sonoma County's agricultural sector and encourage and nurture the development of a manufacturing and sales network based on visitor serving uses and active engagement with the farming operations.



Ragghianti|Freitas LLP

Page 8 of 8

Thank you.

Very Truly Yours,

Riley F. Hurd III

CC: Client



February 13, 2025

County of Sonoma

Permit and Resource Management Departments

2550 Ventura Avenue

Santa Rosa CA 95403

Attn: Joshua Miranda

Re: Ghilotti Project at APN 020-130-037 4485 D Street, Petaluma; Use Permit Application UPE21-0064, File: PLP24-0012

Dear Planning Commissioners/ Board of Zoning Adjustments, Supervisor Rabbitt, and Permit Sonoma,

PRSC urges the BZA to deny the use permit request for the wedding/event center located on Ag zoned lands.

This project clearly represents an end run around the County's zoning laws that prohibits such wedding/events centers on ag land. The proposed project attempts to exploit the General Plan's limited allowance for visitor serving uses in ag zones to support on-site agricultural production and processing operations.

To approve this project would make a mockery of the County's general plan and zoning regulations.

A key requirement in assessing hospitality operations on ag land is a determination that such uses are secondary and incidental to the on-site ag production and processing. In this instance, the proposed hospitality operations are clearly not secondary and incidental as demonstrated by the fact the project applicant is reported to have said that two thirds of their income would be derived from these activities.

**From:** [Moir Jacobs](#)  
**To:** [Pat Gilardi](#); [Joshua Miranda](#); [larry.reid@sonoma-county.org](mailto:larry.reid@sonoma-county.org); [Tennis Wick](#); [Scott Orr](#); [Greg Carr](#); [Tim Freeman](#); [Evan Wiig](#); [Jacquelynn Ocana](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Jennifer Klein](#); [Chris Coursey](#); [James Gore](#); [Lynda Hopkins](#); [Rebecca Hermosillo](#); [David Rabbitt](#)  
**Subject:** UPW21-0064 has requested Zoning Permits  
**Date:** Saturday, February 22, 2025 2:09:55 PM

---

## EXTERNAL

Dear Planning Commissioners/Board of Zoning Adjustments, Supervisor Hermosillo and Permit Sonoma,

Subject: UPW21-0064 has requested Zoning Permits for a small-scale agricultural processing facility and retail sales facility to process and sell lavender products grown on-site. In addition, a Use Permit is requested to hold 28 annual agricultural promotional events for up to 200 attendees each, running for up to 11 hours, with amplified music.

We request the Use Permit for the **events** portion of this application be removed for the following reasons, which the Bloomfield community already shared and we fully support. Bennett Valley Residents for Safe Development is completely opposed to the permitting of far too many events permits across our many rural residential areas with very narrow and often not well maintained road systems.

Herewith is an excerpt from the Bloomfield Community's original written request which we submit again with our full support as well:

“\*The proposed events and events center are inconsistent with the agricultural zoning of the property. The property is zoned LEA and is currently under the Williamson Act (California Land Conservation Act)

\*These Uniform Rules restrict the primary use of agricultural contracted properties to commercial agricultural production and any non-agricultural use must be in an allowable, compatible use and limited in size.

\*Article 06, Section [26-06-005](#) of The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural



production and related processing, support services, and visitor serving uses” Policy AR-4a

This application and the land use change creep that it reflects is creating problems for both Agricultural uses and Rural Residential Land Uses. It also brings conflict to Sonoma County decision makers as they try to implement major land use changes without review, study and determining proper locations and parameters.

We request Sonoma County deny the proposed application without prejudice and **place a moratorium** on submittals and consideration of events on Agricultural zoned property until regulations are in place to effectively manage the direction Sonoma County choses to follow.”

Bennett Valley Residents for Safe Development request the County deny these event permits and please consider this issue when drafting the new General Plan. Sonoma County is now developed with many distinct rural residential neighborhoods which are not compatible to be surrounded by what are essentially commercial activity sites. The County should promote traditional Ag use of our remaining rural lands and concentrate commercial and event activities in appropriate commercial designated zones. This includes any and all commercial cannabis activities.

As the Bloomfield residents wrote “It is no secret commercial cannabis operations are also pushing to have events at commercial cannabis operations on Ag zoned property. We are concerned approval of an application like the one proposed would be used as a roadmap for commercial cannabis and other primarily Ag related uses to submit similar applications.”

We concur, this events use permit is not appropriate for this area nor any other rural residential areas.

Thank you,  
Moir Jacobs  
Bennett Valley Residents for Safe Development

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

Subject: Support for the Villa Vanto Project

To whom it may concern,

I am writing to express my support for the Villa Vanto project. Identifying and supporting new methods of land stewardship that are financially viable is an important step for the future of our community.

The agricultural history of Petaluma is a proud one. Generations have built this community on the hard work in fields, dairies, and orchards. Today, as we face new challenges, our strength lies in blending time-honored traditions with modern ideas. Villa Vanto achieves this by focusing on lavender and developing products and experiences that respect our legacy and open doors for the future. This approach speaks to the heart of the American dream and reflects what Sonoma County and Petaluma have always practiced, creating opportunities through the sweat of our brows and brought to life by the calluses on our hands.

The Villa Vanto project is a practical and promising step forward. It not only honors the rich legacy of agriculture in our region but also paves the way for new business opportunities that benefit the local economy.

Supporting Villa Vanto is an investment in the future of Sonoma County and Petaluma, a future where our deep agricultural roots continue to foster community and sustainable practices. I am confident that this project will help maintain the vibrant spirit of our local farming community and inspire further progress in our region.

I urge you to support the Villa Vanto project as a respectful nod to our past and a smart step toward a diversified and resilient agricultural future.

Thank you for your time and consideration.

Sincerely,

Trent Still, Petaluma Resident.

William Byrne  
1250 San Antonio Rd  
Petaluma CA  
707-972-6167

Permit Sonoma  
Joshua Miranda

Re: Winery Events Ordinance/Staff Omissions

This project is being promoted as being comparable to vineyards and wineries. It is being promoted as an agricultural endeavor in need of expansion to remain a viable entity. Staff would have you believe that the proposal fits the intent of the Winery Events Ordinance. Several factors exist that make this narrative more fiction than fact.

All of the vineyards and wineries that have been granted Use Permits under the Winery Events Ordinance are actual vineyards and wineries. They already exist as viable farms. They are operational entities harvesting crops already planted, bottling and storing wine, operating tasting rooms. They were seeking to expand their existing farm operations.

Villa Vanta has no existing farm operation and no barn. There is no farm activity. When the AG Exempt permit was originally requested, Permit Sonoma sent a representative to the location to verify that there was agricultural activity on the premise. This inspector provided a picture of a grazing cow. No context. It was actually a picture of a cow on the neighboring property. No farm activity.

The applicant would have you believe that the farm is the primary business. It is not. He designed and built an event center and used it as such, illegally. It is the primary concern. This has been Mr Ghilotti's plan all along: to deceive everyone and get what he wants when none of it would normally be allowed. He has no farm and has yet to do any farming on this property. He is simply trying to legalize his event center. This is not an attempt to convert a barn to multi-use. This commercial building should not exist on this property. It would be a massive mistake to allow this property to operate as an Event Center.

Trying to get everyone to believe that the lavender and olive trees are the main event here is ludicrous. The contortions necessary to wrap yourself around that idea are painful.

The overall willingness of Permit Sonoma to validate all of this wrong-doing is proving to be an exceptional effort. The incorrect narratives promoting this attempt to legalize this structure are concerning. The incorrect narratives about this being a working farm, the misleading information relayed to the Department of Conservation and the omission of factual conditions regarding the site conditions relayed to CDFW and other State agencies are grounds enough to reject this Use permit.

William Byrne  
707-972-6167

Permit Sonoma

Re: Transportation Impact Study For Villa Santa Event Center

I am commenting on the study provided for this project. The report shows average daily proposed usage and comments on the amount of traffic observed on D Street on "peak" hours. It attempts to address the increase of 100 plus trips per day during Event Center operation.

First of all, the employee trip configuration is underestimated. It does not include the catering and food and other maintenance services being proposed for these events. All food prep is proposed to be done off-site with constant delivery and the ongoing servicing of sanitation units was not included.

More egregious is the fact that the 100 plus arrivals will happen, not throughout the day, but all at once. There will be a 50-100 new vehicles heading west on D Street, turning left into oncoming traffic, with no turn lane, during a 1-1.5 hour period, not averaged throughout the day. That equals major congestion.

50-100 vehicles are also arriving from the east, but most are not coming from Point Reyes. They are coming from Marin, exiting Hwy 101 North at San Antonio Rd, traveling 5 miles down San Antonio Rd and turning right onto D Street, in the same 1-1.5 hour period. The report does not address this. Traffic is directed onto San Antonio Rd during congestion in downtown Petaluma. Every weekend is congested in downtown Petaluma.

This will be a **major** impact on San Antonio Rd. This roadway is in disrepair at this time, with no shoulders and it is crumbling to less than adequate width in numerous places. There is a history of vehicular accidents on this road due to bad road conditions and increased traffic.

The report also does not include the increased traffic that will result on I Street, as the local traffic will seek to avoid the new congestion created on D Street by introducing 100 plus new vehicles during a 1-1.5 hour window, every weekend, twice a day, during tourist season.

The study also states there is no history of accidents on this section of D Street. That is because there is no current traffic obstacles, such as the one this study was supposed to address. If you introduce new conditions, new behavior will result. This is shockingly inadequate.

This study should be rejected due to its myopic view of the situation at hand. This study started with the desired result and worked backwards in assembling the "facts" to paint a very distorted picture.

William Byrne  
707-972-6167

In a recent article in Press Democrat titled "Lavender farm a cover for events?"

Phil Barber of The Press Democrat reported that:

"he and Katherine [the project applicants] seek to host events at Villa Vanto. They believe the events could generate two-thirds of the farm's retail sales."

Such an admission clearly demonstrates what neighbors and some County officials suspect – that the agricultural activities are secondary to the events and are simply an effort to end run the zoning regulations.

Approving such an egregious flaunting of the requirements of the general plan would not only damage the credibility of the County's zoning regulations, but encourage other copycat projects that want commercial, non-ag operations on agriculturally zoned lands.

In the case of winery events, the County has looked at the level of visitor serving uses in each application. Wineries usually have to invest far more in processing and production facilities and operations, and have a product (wine) to sell into an established market. The hospitality component is supposed to be much smaller than the production operation. With this project, the level of financial commitment to producing the lavender products appears to be much smaller relative to the investment in the entertainment facilities.

Additionally, Page 52, Section 11.b) of the County's mitigated Negative Declaration states "

"The proposed Agricultural Promotional Events will promote and markets products produced onsite and are considered secondary and incidental to the property's primary agricultural production and processing uses; consistent with General Plan Objective AR-4.1 and Policy AR-4a of the Agriculture Resources Element."

The statement in the MND does not include any data or analysis supporting this finding.

PRSC urges the County to reject this flagrant abuse of the County's planning regulations

Thank you

Marc Bombersbach

Preserve Rural Sonoma County



**From:** [billkrawetz@comcast.net](mailto:billkrawetz@comcast.net)  
**To:** [David Rabbitt](#); [Pat Gilardi](#); [Larry Reed](#); [Joshua Miranda](#); [Hannah.Spenser@sonoma-county.org](mailto:Hannah.Spenser@sonoma-county.org); [Tennis Wick](#); [Scott Orr](#); [Tyra Harrington](#); [PlanningAgency](#)  
**Cc:** [Greg Carr](#); [Tim Freeman](#); [Evan Wiig](#); [Jacquelynn Ocana](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Jennifer Klein](#); [Robert Pittman](#)  
**Subject:** Ghilotti Project at APN 020-130-037 4485 D Street, Petaluma; Use Permit Application UPE21-0064, File: PLP24-0012  
**Date:** Thursday, February 20, 2025 10:57:50 AM

---

## EXTERNAL

Dear Planning Commissioners/ Board of Zoning Adjustments,  
Supervisor Rabbitt, and Permit Sonoma,

The Neighbors of West County (NOW) urges the county to deny the Use permit portion of the UPE21-0064 application.

UPE21-0064 application has two parts 1) Zoning Permits for a small-scale agricultural processing facility and retail sales facility to process and sell lavender products grown on-site, and 2) a Use Permit to hold 28 annual agricultural promotional events for up to 200 attendees each, running for up to 11 hours, with amplified music.

Our concern is with the Use Permit portion of the application (promotional events) as the proposed events and the proposed event center are completely inconsistent with the true agricultural use that the property is zoned for. The proposed project attempts to exploit the General Plan's allowance for visitor serving uses in ag zones to support on-site agricultural production and processing operations.

The General Plan requires any visitor serving uses not just to be related to agriculture, but also limited and secondary to agricultural production: Objective AR-6.1: Give the highest priority in all agricultural land use categories to agricultural production activities. Visitor serving uses shall promote agriculture and enhance marketing of Sonoma County agricultural products, but shall be secondary and incidental to agricultural production.

By the applicants own admission, their events will not be "secondary and incidental to ag production" as required by law. In the recent Press

Democrat article reported the applicant's position: "he and Katherine seek to host events at Villa Vanto. They believe the events could generate two-thirds of the farm's retail sales." Their admission clearly demonstrates that the agricultural activities are secondary to the events and are simply an effort to end run the zoning regulations.

Further in the past the applicant has advertised this as a dedicated event venue (weddings, etc.); this confirms the applicant's true objectives have nothing to do with promoting agriculture. Other commenters on this application have already provided supporting documentation as to this misrepresentation. (The facility's social media accounts refer to it as the "Event Barn," or "Wedding Barn"). It's telling that the applicant recently removed these same promotions from its own website. Permit Sonoma's staff report documents and confirms these uses had nothing to do with agriculture (violations: March 2022 unpermitted conversion of agricultural barn to event center. Two Notice and Orders issued: VPL22-0111: Unpermitted events (events ceased, violation closed).

The Neighbors of West County have no objection to the applicant's plans to grow and process lavender on their property, or to engage in limited retail sales of these lavender products. Our concern is with the Use Permit portion of the application (promotional events) as the proposed events and the proposed event center are inconsistent with the true agricultural use that the property is zoned for. It is not reasonable to allow 28 events a year, with up to 200 attendees', with live music until 10pm to help sell lavender. These events are neither incidental nor secondary to the cultivation of lavender. We request Permit Sonoma and the Planning Commissioners/Board of Zoning Adjustment remove the Use permit (for events) portion from this application.

Finally, there seems to be a move at foot pushing for events (weddings, winery, music, cannabis, etc.) on ag lands. The thought being this will help preserve agriculture. In reality in the long term, this commercialization of ag lands will be the end of agriculture. The value added from these new, non-ag ventures further escalates the value and cost of ag lands, accelerating the shift to more and newer higher value

non-ag businesses. This is a death spiral for actual traditional agricultural activities

Thank you  
Neighbors of West County (NOW)

Bill Krawetz

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

Thank you for drawing attention to the illegal development occurring on D Street Petaluma. Mr Ghilotti scammed Permit Sonoma on an Ag Exempt permit (no inspections) so he could build an Event Center, not the hay barn for which he applied.

He signed several County documents acknowledging the major restrictions placed on an Ag Exempt permit. He signed a County document verifying no need for a grading permit. He violated all of that. It was intentional.

Now, he says "Mea Culpa". It was more like a "F--- You"

Now, the architect has modified their website portrayal of the building from their originally featured Premiere Event Center to a multi-use barn. How convenient.

Now, Mr Ghilotti is trying to stretch this "Farm Condom" over what is a serious Williamson Act breach of contract and **it doesn't fit.**

Permit Sonoma mishandled the breach of contract protocols established by law ([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=51250.&lawCode=GOV](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=51250.&lawCode=GOV)).

**Permit Sonoma did nothing that was specified and required by the State legislature regarding possible breach of contract. According to every oversight State agency asked, it is the responsibility of the District Supervisor to implement these protocols.**

Permit Sonoma is ushering in this violation as the new way for developers to abuse the system:

Conspire to defraud the County by submitting one set of drawings exempt from review and then building a different structure. Once you get caught, you can ask for forgiveness and avoid all that messy review and inspection stuff.

The pretense of the pretend farm went from specialty cattle and brood-mares to now grazing sheep. First, it is 11.5 acres of lavender, harvesting only 2 acres (what farmer does that?). Now, it is somewhere between 6 and 8 acres depending on what report you read. Now, they are harvesting 15 acres of lavender off-site, which is a major change from the application.

It is supposed to be a working farm with farming as the primary functioning business. There is currently no farm activity AT ALL, but there is an Event Center. I doubt there will be any planting if the Event Center and its 28 parties are denied. It has been several years in development and zero plants, no farm activity. It is such an obvious scam.

When the Event Center construction was red tagged, the building and property were being advertised as a premiere wedding site. No mention of their new lavender farm and olive orchard. Now we see that all of the plants are simply landscaping for the weddings.

Their Use permit has gone through so many alterations it should simply be denied on its lack of clarity. And it should be thoroughly reexamined by all State agencies involved due to Permit Sonoma clearly misrepresenting to these agencies, all of the facts of the existing development violations.

The article says only a few are objecting because of possible noise issues.

Although the noise will definitely be an issue, it is hardly the only problem. Those

objecting include the surrounding property owners and Protect San Antonio Valley members who have invested in their neighboring rural properties. The issues here are too numerous for this article. The consequences of approving this Use permit are vast. Sonoma County has an obligation to uphold the current General Plan objectives.

**From:** [concerned citizens](#)  
**To:** [Joshua Miranda](#)  
**Cc:** [Nancy and Brantly Richardson](#)  
**Subject:** Subject-UPW21-0064  
**Date:** Friday, February 14, 2025 3:39:08 PM

---

## EXTERNAL

Dear Planning Commissioners/Board of Zoning Adjustments, Supervisor Rabbitt and Permit Sonoma

Subject: UPW21-0064 has requested Zoning Permits for a small-scale agricultural processing facility and retail sales facility to process and sell lavender products grown on-site. In addition, a Use Permit is requested hold 28 annual agricultural promotional events for up to 200 attendees each, running for up to 11 hours, with amplified music.

We request the Use Permit for the **events** portion of this application be removed for the following reasons.

\*The proposed events and events center are inconsistent with the agricultural zoning of the property. The property is zoned LEA and is currently under the Williamson Act (California Land Conservation Act)

\*These Uniform Rules restrict the primary use of agricultural contracted properties to commercial agricultural production and any non-agricultural use must be in an allowable, compatible use and limited in size.

\*Article 06, Section 26-06-005 of The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses” Policy AR-4a

This application and the land use change creep that it reflects is creating problems for both Agricultural uses and Rural Residential Land Uses. It also brings conflict to Sonoma County decision makers as they try to implement major land use changes without review, study and determining proper locations and parameters.

We request Sonoma County deny the proposed application without prejudice and **place a moratorium** on submittals and consideration of events on Agricultural zoned property until regulations are in place to effectively manage the direction Sonoma County choses to follow.

Sonoma County staff is in the process of procuring comments on a proposed **new General Plan for Sonoma County** as a whole. It is important to go through this process and determine Sonoma County’s ultimate future before piecemealing projects such as this proposal. This is especially important as the proposed project does not meet County Code requirements and is an obvious attempt to stage “events” on the property in excess of what would be secondary and incidental to on-site ag production and processing.

Rural residential neighborhoods need distance between non-residential uses and activities that are disruptive to neighborhoods and families. Sonoma County has currently not figured out how to accommodate both uses and provide a livable environment for either group.

In Bloomfield, this application has undeniable implications for a pending, proposed commercial cannabis operation next door. The proposed operation, includes two acres of outdoor cannabis and a 10,000 Sq foot, two story processing plant adjoining several residential property lines and using the communities already sub-standard streets.

It is no secret commercial cannabis operations are also pushing to have events at commercial cannabis operations on Ag zoned property. We are concerned approval of an application like the one proposed would be used as a roadmap for commercial cannabis and other primarily Ag related uses to submit similar applications.

The Bloomfield community of 400 people has been active now for five years writing letters, attending Sonoma County meetings and doing all we can to achieve a way for the community to secure and protect our rural residential way of life. We have also suggested multiple ways for commercial cannabis to be implemented successfully to achieve compatibility. It is a County wide issue as evidenced by this proposed application. Send a message to the Board of Supervisors to achieve what is necessary for compatibility before embarking on piecemeal rural neighborhood by neighborhood incursion into on-site events.

Today, Lavender. Tomorrow commercial cannabis and who know what else?

Thank you for considering our viewpoint

Vi Strain on behalf of

Concerned Citizens of Bloomfield

**THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.**

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.



**From:** [Vi Strain](#)  
**To:** [David Rabbitt](#); [Pat Gilardi](#); [Joshua Miranda](#); [larry.reid@sonoma-county.org](mailto:larry.reid@sonoma-county.org); [Tennis Wick](#); [Scott Orr](#); [Greg Carr](#); [Tim Freeman](#); [Evan Wiig](#); [Jacquelynne Ocana](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Jennifer Klein](#)  
**Subject:** UPW21-0064 -Lavender Products promotional Events on LEA zoned property  
**Date:** Sunday, February 16, 2025 8:23:10 AM

---

## EXTERNAL

February 16, 2025

Dear Planning Commissioners/Board of Zoning Adjustments, Supervisor Rabbitt and Permit Sonoma

Subject: UPW21-0064 has requested Zoning Permits for a small-scale agricultural processing facility and retail sales facility to process and sell lavender products grown on-site. In addition, a Use Permit is requested to hold 28 annual agricultural promotional events for up to 200 attendees each, running for up to 11 hours, with amplified music.

We request the Use Permit for the events portion of this application be removed for the following reasons.

\*The proposed events and events center are inconsistent with the agricultural zoning of the property. The property is zoned LEA and is currently under the Williamson Act (California Land Conservation Act)

\*These Uniform Rules restrict the primary use of agricultural contracted properties to commercial agricultural production and any non-agricultural use must be in an allowable, compatible use and limited in size.

\*Article 06, Section 26-06-005 of The General Plan requires that the “primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses” Policy AR-4a

This application and the land use change creep that it reflects is creating problems for both Agricultural uses and Rural Residential Land Uses. It also brings conflict to Sonoma County decision makers as they try to implement major land use changes without review, study and determining proper locations and parameters.

We request Sonoma County deny the proposed application without prejudice and place a moratorium on submittals and consideration of events on Agricultural zoned property until regulations are in place to effectively manage the direction Sonoma County choses to follow. Sonoma County staff is in the process of procuring comments on a proposed new General Plan for Sonoma County as a whole. It is important to go through this process and determine Sonoma County’s ultimate future before piecemealing projects such as this proposal. This is especially important as the proposed project does not meet County Code requirements and is an obvious attempt to stage “events” on the property in excess of what would be secondary and incidental to on-site ag production and processing.

Rural residential neighborhoods need distance between non-residential uses and activities that are disruptive to neighborhoods and families. Sonoma County has currently not figured out how to accommodate both uses and provide a livable environment for either group.

In Bloomfield, this application has undeniable implications for a pending, proposed commercial cannabis operation next door. The proposed operation, includes two acres of outdoor cannabis and a 10,000 Sq foot, two story processing plant adjoining several residential property lines and using the communities already sub-standard streets.

It is no secret commercial cannabis operations are also pushing to have events at commercial cannabis operations on Ag zoned property. We are concerned that approval of an application like the one proposed would be used as a roadmap for commercial cannabis and other primarily Ag related uses to submit similar applications.

The Bloomfield community of 400 people has been active now for five years writing letters, attending Sonoma County meetings and doing all we can to achieve a way for the community to secure and protect our rural residential way of life. We have also suggested multiple ways for commercial cannabis to be implemented successfully to achieve compatibility. It is a County wide issue as evidenced by this proposed application.

Send a message to the Board of Supervisors to achieve what is necessary for compatibility before embarking on piecemeal rural neighborhood by neighborhood incursion into on-site events.

Today, Lavender. Tomorrow commercial cannabis and who knows what else?

Thank you for considering our viewpoint  
Vi Strain on behalf of  
Concerned Citizens of Bloomfield

**THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.**

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

William Byrne  
1250 Sn Antonio Rd  
Petaluma CA 94952

Permit Sonoma  
Joshua Miranda

February 19 2025

RE: Villa Vanto Farm MND Comment

I am responding to the letter of support submitted by Mr Ghilotti's hired law firm. It must be odd having to solicit favor through a firm on retainer. This must be a very special client for them to support his bad behavior. The letter skews the facts and makes several statements that can only be viewed as misinformation.

I am sure that the Ghilottis, the law firm's clients, are currently trying to legitimize their illegal attempts to defraud Sonoma County and its tax-paying residents. The problem is that they have arrogantly and intentionally pushed this abuse of the General Plan on the surrounding property owners.

The letter states that the Ghilottis held their own wedding in the event center, that their excitement for their own wedding led to this circumstance, and "Getting excited about your own wedding is not a crime".

What is a crime is conspiring to defraud the county by submitting one set of drawings to secure an AG Exempt permit, and then building a completely different structure. There are two distinct sets of plans. This is not an , "oh by the way I put in some plumbing". It is a completely different structure from the plans submitted. It was featured on the architect's website as the new premiere wedding event center. No mention of a farm. This website has since been altered, once their clients got caught violating most of the rules and regulations governing commercial construction.

What is a crime is continuing construction after the project was red-tagged for four serious violations.

Mr Ghilotti put his subcontractors in serious jeopardy of losing their contractor's licenses by having them continue operations to complete the Event Center so he could hold an illegal gathering in an un-permitted, un-inspected building. This speaks to his character.

When confronted about their continued construction activity after the violations were issued, the subcontractors had no answer. Mr Ghilotti then called me in August 2022 to say that he lied to his contractors about having the proper permits and that he lied to them about being red tagged. He then threatened me with litigation. He also continued construction, which is also a crime.

There were no fire prevention measures in place, no event permit. His Ag Exempt permit and Williamson Act provisions totally restricted barn occupancy. He signed several documents acknowledging this. That is also against the law.

What else is a crime is signing a county document, under penalty of perjury, stating that no grading permit was needed. I thought it was Mr Ghilotti's profession to move dirt? A violation was issued for this also.

You state that your clients intended this lavender farm all along, since they purchased the property. Three years into this disgrace, and there is still no plantings of any kind. They also continued illegal grading.

Their attempts to fit the event center under the Williamson Act guidelines amounted to a cut-and-paste of the allowable activities listed on the county website on contracted properties. First it was cattle and brood-mares and 11.5 acres of lavender. Now it's sheep and growing lavender off site. The narrative has changed so much in trying to stretch the "farm condom" around the Event Center that the Use permit should be resubmitted when they decide what kind of farm they actually want. The only constant here is the Event Center. In August 2022, your client parked 100+ cars in a dry grass field, erected a 30' tall light tower and used an unpermitted building for a wedding event. This total disregard for the area property owners is telling. His behavior suggests he cares only for his own goals.

Your statement about realizing the barn would not work for public use caused the Ghilottis to change direction is false. The Ghilottis used two sets of drawings to scam the county. That is not up for debate. This is a different structure altogether. The only element true for both drawings in the 40' x 50' footprint. Everything from there up is designed and built as an event center, not the barn. Nothing in this building resembles the original drawing submitted to secure a permit. Saying this is just an amended barn drawing is completely false. These are deliberate actions to conceal illegal construction.

As far as "imposing stringent life safety requirements" in the Event Center, the conversion, if approved, would ignore the Wildland-Urban-Interface rules. The barn was built without fire resistant siding. This feature is required of all commercial buildings under the Wildland-Urban-Interface rules for Occupant safety. This is just another example for your clients avoiding all those messy, expensive rules and regulations. So much for enhanced safety...

If approved, your client will be responsible for self regulating his Use permit activities. He has proved to be unreliable. So far by his actions he has proved that he is a cheater and he admitted he has lied his way to this point. Ten days ago, when interviewed by the Press Democrat, he continued his misinformation making several statements that he knew to be false.

Your clients have proved to be not believable. Your narrative spells out specific duties the Ghilottis plan to do to legitimize the Event Center. All of it is just a story to recover their Event Center investment.

Make no mistake, this is a plan for a well landscaped wedding center, not a farm needing extra income. They do not need a Use permit to operate as a farm. They do need one to host 28 unregulated non-agricultural events. Providing lavender centerpieces for the weddings is not promoting your farm, especially when it grown elsewhere.

If the Use permit is denied, as it should be, I doubt that the Ghilottis will continue with the farm idea. So far, no farm. Only the Event Center.

There is no question that the events are the priority. Water use, Income estimates, property development all favor the wedding parties. The crop is now being grown elsewhere. The land improvements being requested all are in support of the Event Center use. None of it is for facilitating the farm.

Their expanded use also removes over 5 acres from farm production, which is not allowed, and they are scamming the system to avoid that detail.

Your narrative about the continued construction is also not true. He knew what he was doing was illegal and would not be allowed. That he documented the unpermitted construction is irrelevant. He is scrambling now to save himself from his disregard for the rules.

You ask that the county see this request with "fresh eyes", and to "disregard the misplaced speculation". Your client should bear the responsibility of his actions. His lying and cheating is unacceptable behavior. He does not in any way foster confidence or respect. His actions speak louder than his words, and he is not to be trusted.

Sincerely

William Byrne

County of Sonoma

5/28/2024

2550 Ventura Avenue

Santa Rosa, California 95403

To: Sonoma County Board Planning and Board of Zoning Administrators

Subject: Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

To Whom it may Concern:

We were quite excited to learn of the Ghilotti project! This is a letter of support for this innovative agricultural project which identifies so many of the factors that this county will be facing with the downturn of our current mono culture of grapes and wine production. The timing of this project is fortuitous as it comes at a time when agricultural choices and lifestyles will be greatly impacted by the economics of the wine industry. This is a beautiful alternative, offering customers a fantastic experience which is new, different, and innovative, and best, it allows the agricultural history of this county to continue to flourish, and will help Sonoma County maintain its worldwide reputation as an important agricultural center.

I have known Mario and Katherine for many years, and what I see in both of them is their complete dedication to building a sustainable business for both their family and the county. It is inspirational to us, in this tough climate for agricultural, to learn about a project which can make financial sense for a family, aesthetic sense for the community, sound agricultural sense for the land, and a financial success for the county. It is truly a win/win project, and is just what the devastated agricultural community needs to see supported and applauded by Sonoma County.

Mario and Katherine have the determination, the integrity, the intelligence, to make this project an enviable success. We will be out of town during the hearing, but I am available at any time before June 15<sup>th</sup> to comment further or answer any questions about my position. Thank you for allowing me to weigh in on this proposed use permit!

Sincerely

Nancy J Cline

Cline Cellars Winery

24737 Arnold Drive

Sonoma California 95476

707-974-4632

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403

**To:** Sonoma County Board Planning and Board of Zoning Administrators

**Subject:** Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my enthusiasm for the proposed project at Villa Vanto. As a member of the Dairy Farming industry in Sonoma County, I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants.

I believe the applicants have found a creative way to maximize the agricultural potential of their property. By farming lavender the applicants have chosen an ideal crop for growing on their sloped land, as well as minimizing the use of water due to lavender's growing needs. Being part of a generational farm in Sonoma County, Mertens Dairy, it is positive to see the continuance of farming the land. Sonoma County was built on farming, and adding to that history by the creation of this lavender farm would be a great way to continue the tradition of farming in our great county.

As a Sonoma County resident for 32 years and the 4th and 5th generation of Dairy Farming and Winery/Grape Growing families in the valley, I foresee that the proposed project will yield a positive outcome for our county. New and innovative agricultural endeavors contribute to the flourishing of our community as a whole.

Mario and Katherine Ghilotti, are the ideal candidates to take on such a project. Their vision is fueled by their passion for the land and keeping the beauty of Sonoma County alive. They have the resources and devotion to turn this project into something beautiful, while being stewards of the land and enhancing the beauty of farming in the valley.

I fully support the Villa Vanto project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,



Dustin Mertens  
5<sup>th</sup> Generation Sonoma Valley  
707-486-9809



County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403


**To:** Sonoma County Board of Planning and Board of Zoning Administrators

**Subject:** Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

 Bobby Aycock MO  
472 Pepper Ln  
Petaluma

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403

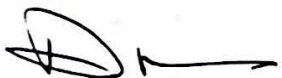
To: Sonoma County Board of Planning and Board of Zoning Administrators

Subject: Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

 Diana Weiss MD  
200 Pepper Rd  
Petaluma

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403

To: Sonoma County Board of Planning and Board of Zoning Administrators

Subject: Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,



2-26-25

4690 D Street Ext

Petaluma CA 94852

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403

**To:** Sonoma County Board of Planning and Board of Zoning Administrators

**Subject:** Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

*Kathy Carzelli*  
1915 D St. Ext.

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403


To: Sonoma County Board of Planning and Board of Zoning Administrators

Subject: Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

  
Dennis Merrill

4001 D 57

County of Sonoma  
2550 Venture Ave  
Santa Rosa CA, 95403

**To:** Sonoma County Board of Planning and Board of Zoning Administrators

**Subject:** Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

I'm writing this letter of support to express my support for the proposed project at Villa Vanto. I have carefully reviewed the project plans, use permit submittal, and the overall business plan put forth by the applicants. I believe the applicants will maximize the agricultural potential of their property.

I support the Villa Vanto farm project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

*Philip Holyka*

4260 P ST

*County of Sonoma*  
*2550 Venture Ave*  
*Santa Rosa CA, 95403*

**To:** Sonoma County Board Planning and Board of Zoning Administrators

**Subject:** Villa Vanto Lavender Farm Processing and Promotional Events Use Permit

We are writing this letter of support to express our enthusiasm for the proposed project at Villa Vanto. As members of the business community in Sonoma County, we believe the applicants have found a creative way to maximize the agricultural potential of their property.

The diverse and self-sufficient aspects of the property support the continuation of the rich agricultural heritage of Sonoma County.

Also, since the county has developed a significant tourism aspect, their project uniquely adds to the experience of travelling to Petaluma and the county as a whole.

As a Sonoma County resident for 59 years I foresee that the proposed project will yield a positive outcome for our county. New and innovative agricultural endeavors contribute to the flourishing of our community as a whole.

The educational aspects of their project will yield a better understanding about how much our lives are tied to the health and good stewardship of the land that we have been privileged to call our home.

I fully support the Villa Vanto project and believe it will be a valuable addition to our community. Please feel free to reach out if you require any further information or assistance.

Sincerely,

Carl and Ruth Palmgren  
3121 Skillman Lane  
Petaluma, Ca 94952  
Cell: 707-321-8301





Mario Ghilotti &lt;mario@vero-west.com&gt;

---

**4485 street, Petaluma**

---

**Willie McDevitt** <Willie@mcdevittconstruction.com>

Wed, Feb 26, 2025 at 4:26 PM

To: Mike Ghilotti &lt;mikeg@gbi1914.com&gt;, "mario@vero-west.com" &lt;mario@vero-west.com&gt;

Please pass this on to County

Did this in a hurry between zoom calls

Hello

As a Petaluma resident who lives nearby (1.6 miles), I am in support of the proposed Villa Vanto lavender farm and event proposal. I believe it is the right balance of agriculture and limited event use needed to sustain the farm and become a community asset.

Farming in Sonoma County is becoming more difficult which this creative proposal addresses. As we lose dairies, cattle, horses, grapes, new agriculture needs to replace some of it, especially on small rural parcels. Villa Vanto and similar uses will help sustain diverse agriculture in Sonoma County.

The Ghilotti family will be good stewards of the land and responsible event managers.

Please approve the proposal as presented.

**Willie McDevitt**  
441 Black Oak Drive  
Petaluma, CA 94952

**Phone:** (707) 763-3000  
**Fax:** (707) 778-0386  
**Cell:** (707) 953-5810

**E-mail:** [willie@mcdevittconstruction.com](mailto:willie@mcdevittconstruction.com)



8 March 2025

RE: Villa Vanta Farm's proposed wedding venue on Sonoma County Agriculturally zoned and designated Ag land near Petaluma

Dear Planning Commissioners, Board of Zoning Adjustments,  
Board of Supervisors and Permit Sonoma,

West County Rural Alliance respectfully requests all Sonoma County entities deny the use permit request for the wedding/event center located on Ag zoned lands near Petaluma.

A key requirement in assessing hospitality operations on ag land on this property is a determination that such uses are secondary and incidental to the on-site ag production and processing. We understand the landowner submitted an application in April 2021. In a Press Democrat article titled: "Lavender Farm A Cover For Events?" the owner and his wife, the project applicants, were quoted as saying they seek "to host events at Villa Vanto" because they, "believe the events could generate two-thirds of the farm's retail sales." Such a statement indicates that the agricultural activities are very likely secondary to the events.

They further stated in another report: "We took an ag building and turned it into a commercial building" and intend to have it be a wedding venue and for other events. Rural Alliance's understanding is that applicants illegally constructed the commercial building without applying for any required permits, zoning or General Plan changes.

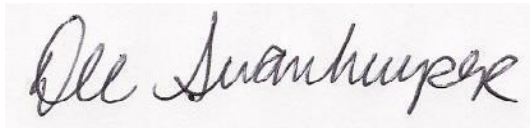
Additionally, research indicates the Sonoma County General Plan, the county's Zoning Codes, the rules of the Petaluma Dairy Belt Specific Plan Area and a state law called the Williamson Act do not allow for these non-ag commercial uses on this property at the level the applicants intend.

Approving this project in this ag designated location could encourage landowners throughout the county who want large, commercial, non-ag operations on agriculturally zoned lands including those located in the West County to follow suit.

We heartily support farmers, ranchers and the many agricultural products **we purchase and they produce** on Sonoma County's agricultural lands, particularly organically grown food and wine.

The West County Rural Alliance dutifully requests all Sonoma County agencies and departments to reject this applicant's proposed project.

Regards,

A handwritten signature in cursive script, reading "Dee Swanhuysen", written in dark ink on a light-colored background.

Dee Swanhuysen,  
West County Rural Alliance  
1800 Jonive Rd  
Sebastopol, CA 95472



444 Payran Street | Petaluma, CA 94952-4244  
Tel.: (707) 762-3850 Fax: (707) 762-6118  
www.northbaylandscape.com  
CA Lic. #723370



February 27, 2025

County of Sonoma  
2550 Venture Avenue  
Santa Rosa, California 95403

**Jeff Pottorff**

jeff@northbaylandscape.com  
www.northbaylandscape.com

444 Payran Street  
Petaluma, CA 94952-4244  
CA Lic. #723370

Phone: (707) 762-3850  
Fax: (707) 762-6118

To: Sonoma County Board Planning and Board of Zoning Administrators

Subject: Vivlla Vanto Lavender Farm Processing and Promotional Events Use Permit

My name is Jeff Pottorff, and I am here today to express my strong support for the proposed Project at Villa Vanto. As a landscape company owner and resident of Petaluma for 20 years, Third generation in Petaluma, I haave reviewed the project plans, the use permit application, and the overall business proposal submitted by the applicants.

I believe Mario and Katherine Ghilotti have found a creative and thoughtful way to maximize the Agricultural potential of their property. This project will be good for agriculture in Sonoma County. No impact to neighboring properties.

For these reasons, I fully support the Villa Vanto project and encourage you to approve their request.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Pottorff', written over a light blue circular stamp.

Jeffrey Pottorff  
25 Wallenberg Way  
Petaluma, California 94952  
707-762-3850

March 8 2025

T<sup>9</sup>  
about Sonoma County Board Planning and Board of Zoning Admin.  
Villa Vento Lavender Farm Processing and Promotional Events Use Permit

I am writing in support of Mario & Katherine Ghiletti for their proposed project at Villa Vento. I have reviewed their project, use permit and plan of use for their property. I believe they have found a viable and creative way that will enhance the property while creating jobs and increasing county tax revenue.

Our family has been in rural production agriculture since the late 1800's and I am 5th generation agriculturist in both dairy and beef enterprises. With that in mind I like to see creative ways to sustain a living while keeping properties open and prosperous. Once again I support Mario & Katherine proposed project and please feel free to reach out if you all have any questions

regards, Phil Doleone



1200 Marshall Rd.  
Petaluma, CA, 94952  
707-763-9785



April 22, 2025

To: Sonoma County Planning Commission; Josh Miranda, Planner, Permit Sonoma; Kyle Martin, Planner, Permit Sonoma  
Cc: Tennis Wick, Director, Permit Sonoma  
**Re: PLP24-0012 (4485 D St., Petaluma)**

Dear Planning Commission Members:

The Sonoma County Chapter of Community Alliance with Family Farmers (CAFF) submitted comments in January of this year endorsing the letter submitted by the Neighborhood Coalition detailing the many substantial reasons why this application should be denied. We also endorsed the letter submitted on Feb. 12, 2025 by Preserve Rural Sonoma County urging denial of this application. This project has a history of blatant abuse of agricultural zoning, building requirements, and Williamson Act requirements. These previous violations have yet to be rectified, yet the applicant is now requesting permits for agricultural processing and "promotional events" – even though there are no crops in the ground! **There must be verification of actual production that could support a processing operation, and any visitor serving uses must abide by the County General Plan.**

The Ag Element of the Sonoma County General Plan states that regarding visitor serving uses, "it may be allowed if, the use is compatible with and **secondary and incidental to agricultural production** activities in the area." Production must come first, not the events, which cannot promote production that does not exist.

With regards to the proposed lavender processing facility, the size and scale does not seem realistic. As an agricultural organization, we know that experienced farmers are the experts and we are familiar with some legitimate lavender farms. An established lavender farmer who does this type of processing stated that they have 9.5 acres with 35,000 lavenders and their processing facility is less than 900 square feet. They do all the work with two part-time (20 hours or less) people, who usually only work from June through October. They also stated that it would take at least three years after planting before the lavender is large enough to commercially harvest, and that it takes a long time to fine tune the operation: harvesting, drying, distilling, product formulation, etc. Most lavender is harvested once a year.

Perhaps the size of the facility is based on an attempt to justify use of an "ag exempt" barn that was built without appropriate permits instead of a realistic agricultural production plan? Approval of this project will set the precedent that it is permissible to build an event barn on agriculturally-zoned land under false pretenses.

In addition, it is clear from the event types listed that **the applicants' main goal is to host private events inside of the barn with amplified music.** Event centers such as this are not allowed on agriculturally zoned land.



The applicant should submit the processing applications once they have a product to process and promote. And if the parcel will continue to have Williamson Act protection, no permanent event center can be allowed. Please deny these applications.

Thank you for considering our views.

Wendy Krupnick  
President, CAFF Sonoma County



**From:** [Tasha Levitt](#) on behalf of [PlanningAgency](#)  
**To:** [Joshua Miranda](#); [Kylie Martin](#)  
**Subject:** FW: PLP 24-0012, Ghilotti  
**Date:** Tuesday, April 22, 2025 10:56:32 AM

---

---

**From:** Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>  
**Sent:** Monday, April 21, 2025 12:06 PM  
**To:** PlanningAgency <[PlanningAgency@sonoma-county.org](mailto:PlanningAgency@sonoma-county.org)>  
**Subject:** FW: PLP 24-0012, Ghilotti

**Scott Orr**  
Assistant Director

---

**From:** Greg Carr <[greg99pole@gmail.com](mailto:greg99pole@gmail.com)>  
**Sent:** Monday, April 21, 2025 10:25 AM  
**To:** Cecily Condon <[Cecily.Condon@sonoma-county.org](mailto:Cecily.Condon@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>  
**Subject:** PLP 24-0012, Ghilotti

## EXTERNAL

Please forward the following to the applicable Board members and staff prior to the April 24 hearing.

The applicant's response to the BZA's request from the February hearing is helpful in that it offers the possibility to put the event proposal in context. Any events allowed should be based upon a judgment of what is secondary and incidental to the anticipated production.

Unfortunately, to my knowledge, the County staff does not have experience with this type of agriculture to rely upon the projected production with any confidence. Secondly, the applicant does not have the experience or track record in this field that would establish the reality of their production capability.

For these reasons it seems to me that the applicant should establish a track record of production on this site before the County approves events for this project. Upon return to the County, the applicant's actual production could be compared to the projection. The approval of the two zoning permits would allow them to establish that record before returning to the County for the desired events.

Having said that, it seems to me that allowing educational tours for the production, processing, and sales operation under the two zoning permits would provide much needed support for those activities. These educational tours should be limited to 10

per year with a maximum attendance of 40 to assure that the tours are in keeping with the small scale of the operation.

Thank you for your consideration

Greg Carr

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Anne DeChelbor](#)  
**To:** [Larry Reed](#); [Eric Koenigshofer](#); [Shaun McCaffery](#); [Tennis Wick](#)  
**Cc:** [Joshua Miranda](#)  
**Subject:** Proposed Lavender Farm/Event Center -4485 D Street Petaluma - Public Hearing for April 24, 2025  
**Date:** Tuesday, April 22, 2025 12:34:58 PM  
**Attachments:** [Villa Vanto wedding website.pdf](#)

---

## EXTERNAL

Dear Commissioners

I will make this email very brief. I want you to know that I do not object to a lavender farm and a farm stand on the above property. I object to the consistent manipulation of Mario and Katherine Ghilotti that has been going on since they purchased this property and built a non-permitted 5000 sq. ft. event center. Their intent has always been and still is a wedding event location; the source of their substantial future income.

I have attached a few pages of their original website for you to look at. This is what I object to and what I know will happen if you let Mario and Katherine get away with Events on what is supposed to be Williamson Act protected land.

We purchased our land for all the beauty and serene, quiet surroundings, not 28 wedding events with loud music, hundreds of people getting drunk, getting into their cars and trying to exit D Street in the dark hours of the night. Accidents and deaths are bound to happen. I am not looking forward to this occurring, and I am hoping you are not wanting to be responsible if it does.

I thank you and appreciate your reviewing my concerns and attachments.

Anne DeChelbor

31-year resident and adjacent neighbor to Ghilotti's property, and most affected by these events.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

# Villa Vanto Website

## Home page on March 25, 2022



VILLA VANTO

[Home](#)

[Events](#)

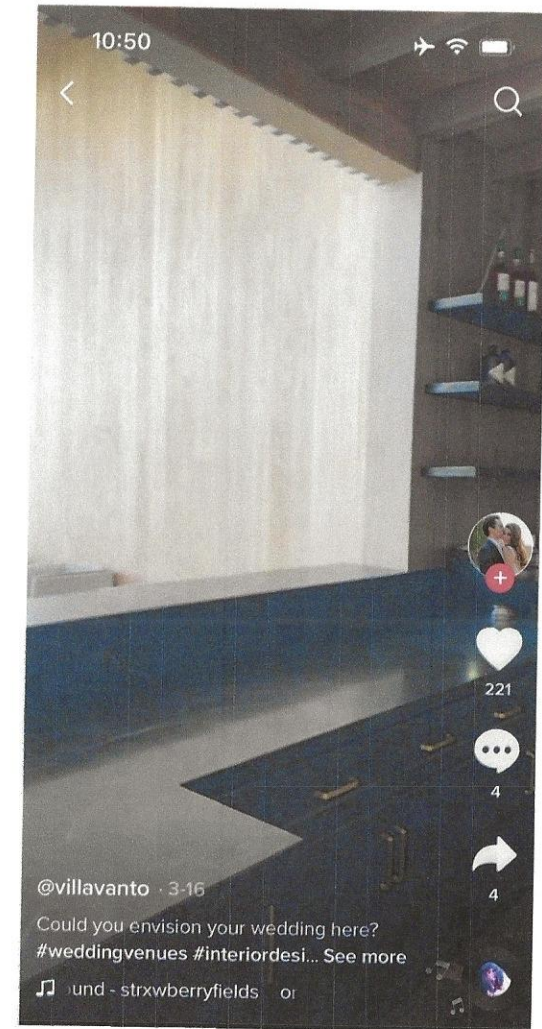
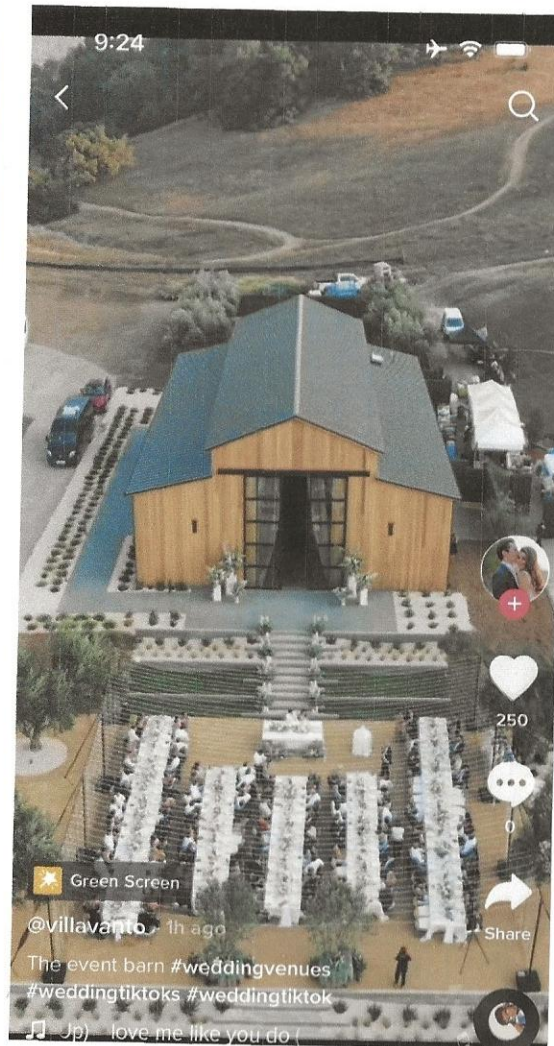
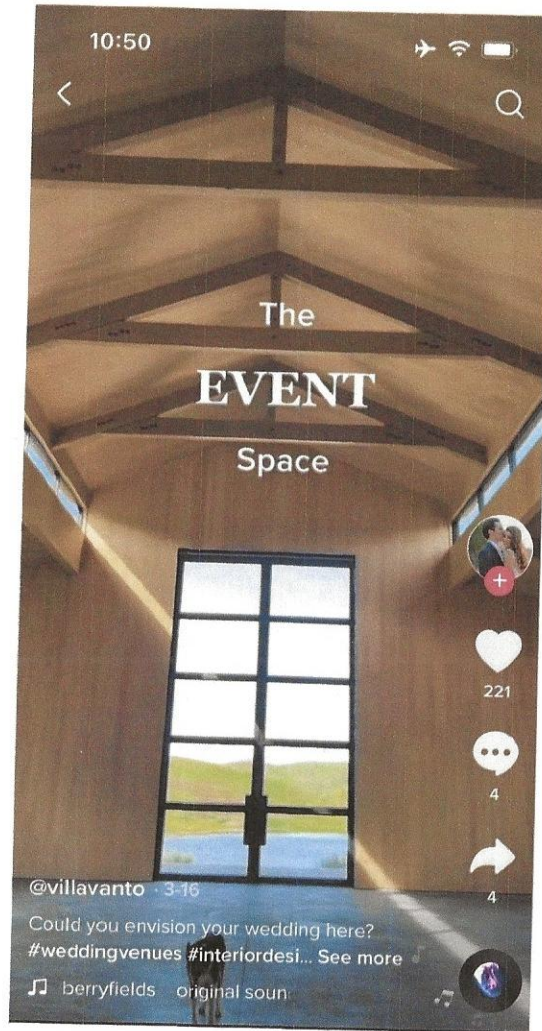
[About Us](#)

[Gallery](#)



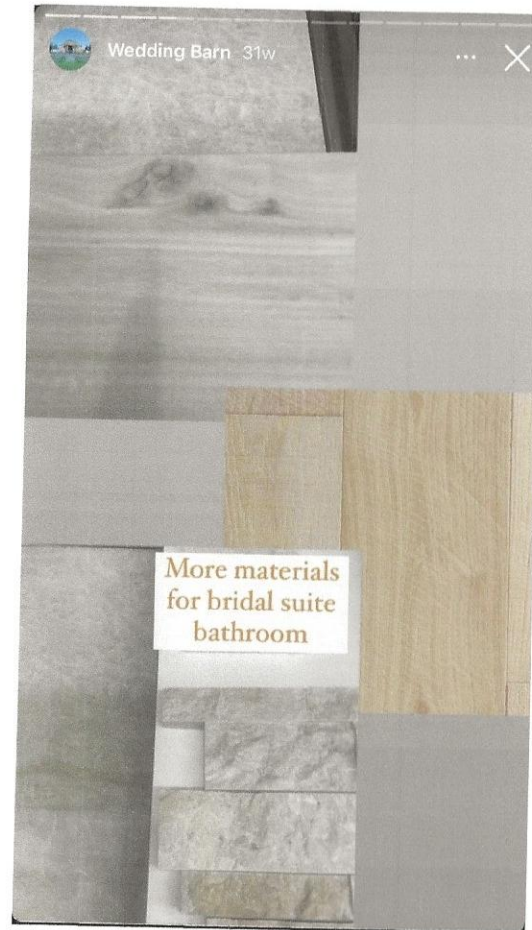


# Event Barn – interior and exterior spaces





# Bridal Suite in Event Barn





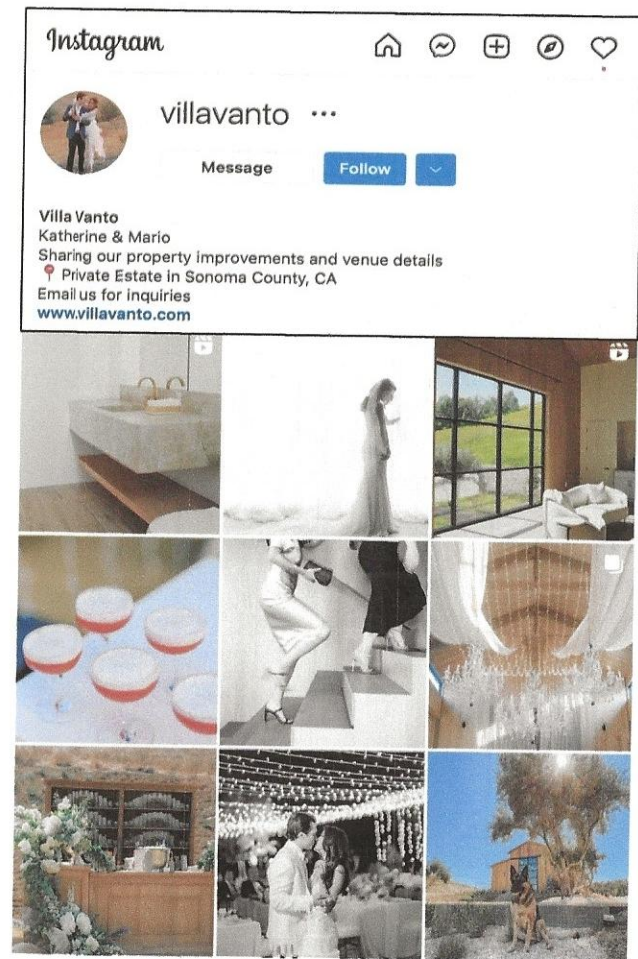
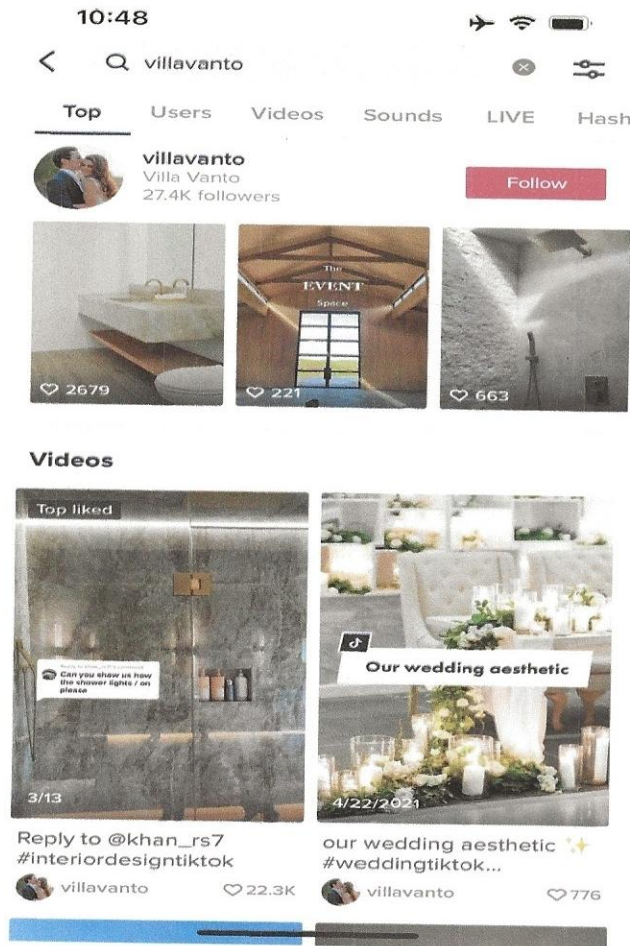
# "Groom Barn"





# Tik Tok and Instagram Pages for Villa V.

## on March 25, 2022



**From:** [Protect San Antonio Valley](#)  
**To:** [Joshua Miranda](#)  
**Cc:** [Larry Reed](#); [Eric Koenigshofer](#); [Shaun McCaffery](#); [Scott Orr](#); [David Rabbitt](#)  
**Subject:** PLP24-0012 Barn Construction Timeline  
**Date:** Tuesday, April 22, 2025 4:37:53 PM  
**Attachments:** [Ag Exempt building Timeline 4-22-25.pptx](#)

---

## EXTERNAL

Hi Joshua,

Hope you are well.

During the hearing Commissioner Koenigshofer mentioned that he would like to see a timeline, from when the Ag Exempt Permit was issued to when the building was completed. I went back and looked at the documents and prepared the attached presentation to answer his question. I'm sending it to you so it is accessible to the group.

Take care,

Deirdre

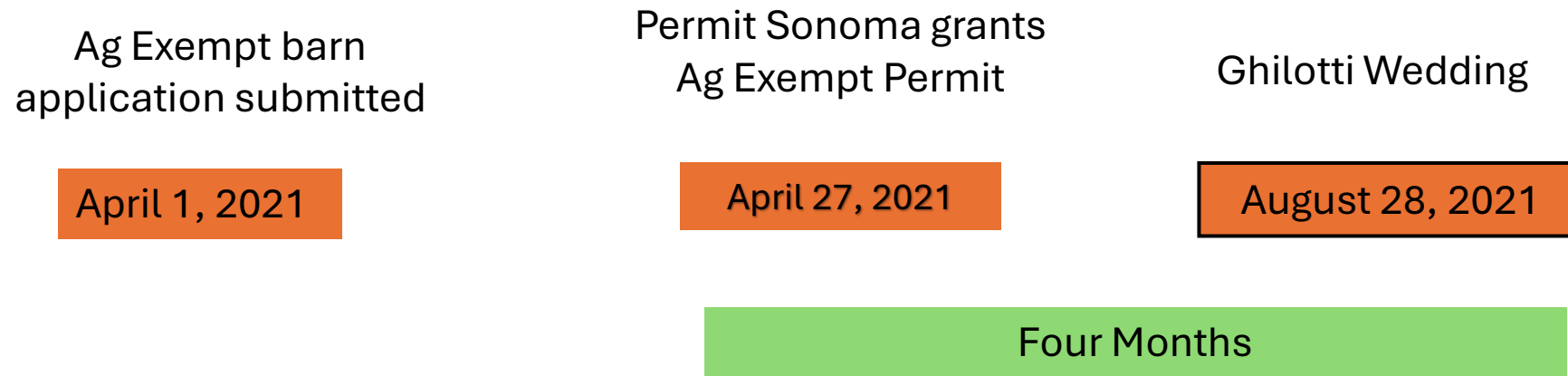
--



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

# Project Construction – Timeline and representations



# April 1, 2021 "Ag Exempt" Building Permit Submitted

Mario Ghilotti 415-760-1936		4485 D St. Ext.
Property Owner's Name	Contact Phone #	Site Address
4485 D St. Ext.		Petaluma CA 9
Mailing Address		City/Town
Petaluma	CA 94952	020-130-07
City/Town	State/Zip	Assessor's Parcel Number
4000 SF	80' X 50' X 30'	Permit Exemption Number
Size of Proposed Building	Length / Width / Height	
Cattle Grazing		
Present Use of Land		
farm MACHINES, Hay + Grain		
Use of Proposed Building		
In accordance with the provisions of Section 7-7 of the Sonoma County Code, I hereby permit exemption. This application is for a building to be used for housing farm products that are harvested from or utilized on the same parcel of land as the property.		
The proposed building complies with the following:		
1.	The building will be located 60 feet, or more, from all property lines.	
2.	The building will be located 60 feet, or more, from other non-exempt structures, unless a reduced separation is approved.	
3.	The building will not contain waste plumbing.	
4.	A building permit shall be obtained for any electrical work.	
5.	The parcel on which the building will be located is five (5) acres or greater.	
6.	The agricultural building, as defined in Section 202 of the CBC will not be used for human habitation or used by the public.	
7.	The building will be located on appropriately zoned agricultural property.	
8.	The property on which the building will be located is presently used for agricultural purposes.	
9.	The proposed exempt building is limited to two (2) stories of wood framed or manufactured engineered buildings. Wood structural members are limited to 25 foot spans unless an engineered plan of the building has been prepared and submitted with the application.	
10.	Not located in Flood Zone as established by Sonoma County Code chapter 7B.	
I agree to comply with all County Ordinance and State Laws regulating building construction. I agree that construction on the proposed building shall not commence until the site evaluation has been completed and I have received written notification of approval from PRMD.		
Mario M. Ghas		
Signature of Property Owner		
4		
Date		

# Applicant Representation Included in AG Exempt Permit File (April 2021)

County of Sonoma

Permit and Resource Management Department

To whom it may concern,

The property at 4485 D St. Ext. Petaluma CA is currently being used to graze commercial cattle. This additional agricultural exempt structure will allow enough storage for hay, grain and farm equipment. This additional building will support all year grazing instead of having to rotate cattle to other properties. This new barn will be a wood framed pole barn, concrete slab on grade, and metal roof, that will increase and support the existing agricultural use.

The property at 4485 D St. Ext. Petaluma CA is currently being used to graze commercial cattle. This additional agricultural exempt structure will allow enough storage for hay, grain and farm equipment. This additional building will support all year grazing instead of having to rotate cattle to other properties. This new barn will be a wood framed pole barn, concrete slab on grade, and metal roof, that will increase and support the existing agricultural use.



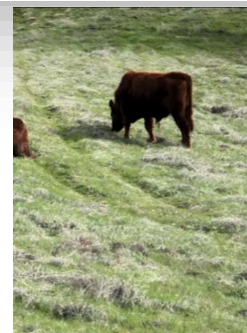
Mario Ghilotti

4485 D St. Ext.

Petaluma CA 94952

415-760-1936

mariog@gbil914.com



Note: Photos of cows included on a separate page by the applicant. Combined here for brevity.

# Ag Exempt Permit Approved – April 27, 2021



County of Sonoma  
Permit & Resource Management Department

April 27, 2021

GHILOTTI MARIO  
4485 D ST EXT  
PETALUMA, CA 94954

Re: Site Evaluation at: 4485 D St, Petaluma [PET]  
A.P.N.: 020-130-037  
File Number: AEX21-0009

To whom it may concern:

Recently I visited your property at the above address as the first step in processing your request for an agricultural exemption from building permit requirements.

Your proposal seems to meet all the requirements of the Agricultural Exemption program. Please accept this letter as your notice of approval.

Permit Sonoma will cause a notice to be recorded with the Sonoma County Recorder's Office with the title of your property. This recording takes from two to four weeks but is delayed in light of the COVID-19 pandemic. After the notice is recorded, we will send a copy to you. Any future owner of your property will be notified that your building was not inspected to verify code compliance.

Please remember that this program places severe restrictions on the future use of the building. A permit must be obtained for any future change in use.

Should you have

Sincerely,

A handwritten signature in blue ink that reads "Paul Marquez".

Paul Marquez  
Senior Plans Examiner

cc: AEX21-0009

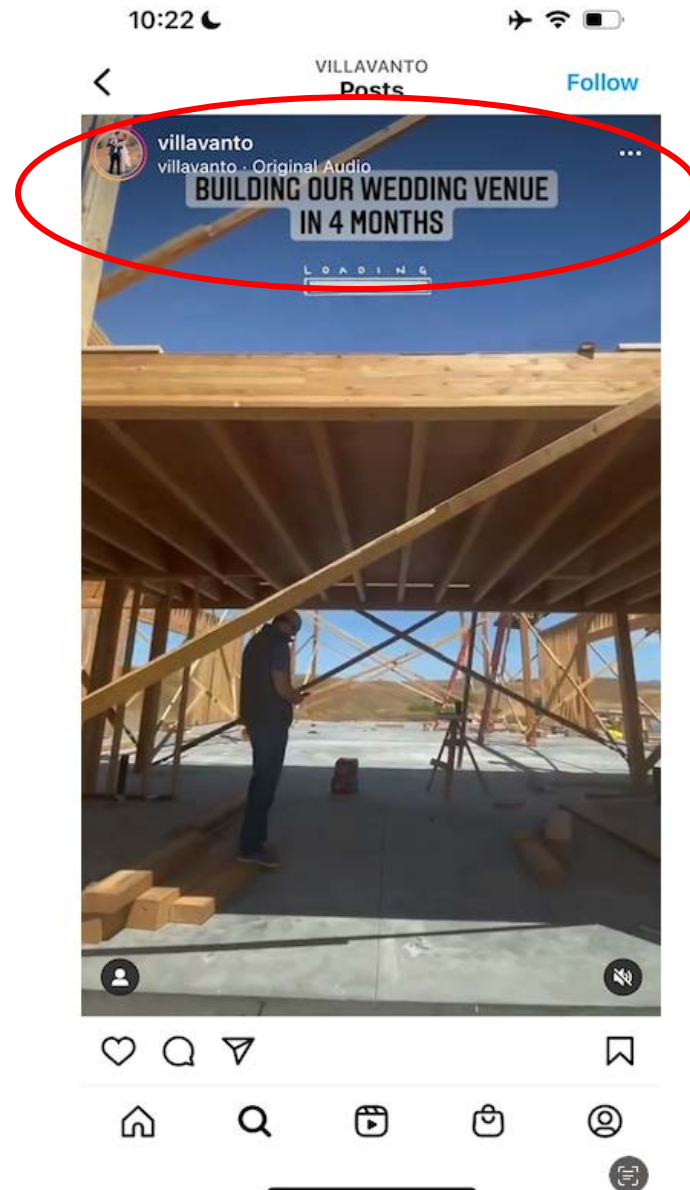
Please remember that this program places severe restrictions on the future use of the building. A permit must be obtained for any future change in use.



# Social Media Post on Villa Vanto Account

Ag Exempt Barn  
Building Permit  
Granted

April 27, 2021

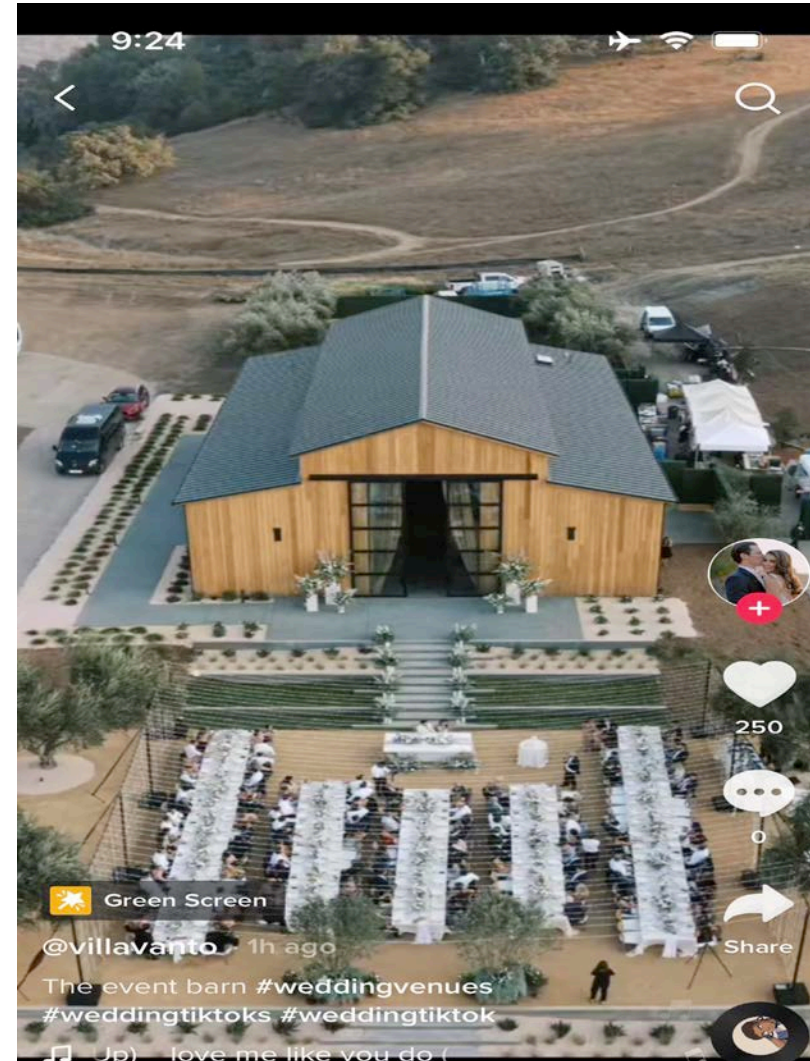
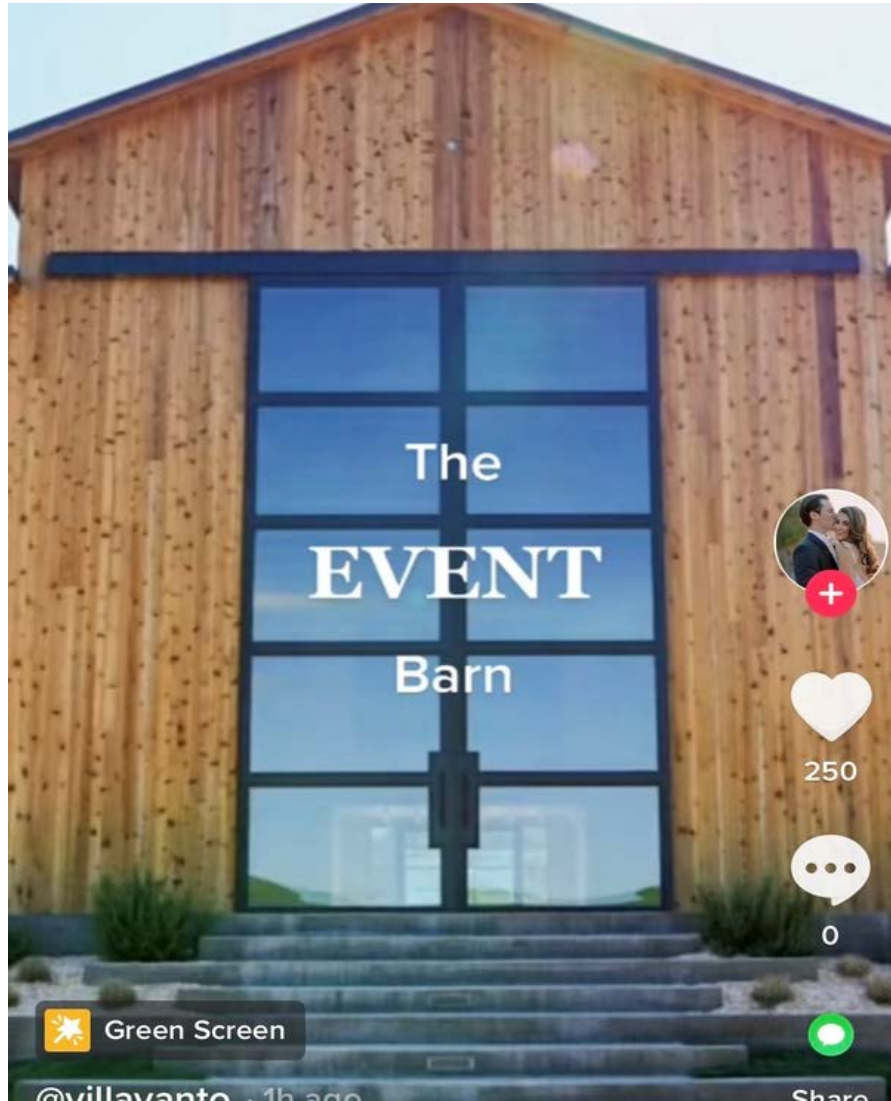


Ghilotti Wedding

August 28, 2021



# “Event Barn” Completed by Wedding Deadline – August 28, 2021



**From:** [Guillermo Duran](#)  
**To:** [Tim Freeman](#); [Larry Reed](#); [Pat Gilardi](#); [Evan Wiig](#); [Chuck Striplen](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Tennis Wick](#); [Joshua Miranda](#)  
**Subject:** Hoping to Uphold the Integrity of Our Valley — Event Center Concerns  
**Date:** Wednesday, April 23, 2025 11:14:10 AM

---

## EXTERNAL

Dear Council Members,

I appreciate your time and dedication to our community. I'm writing to express concerns about the proposed event center on Williamson Act land. I'm writing once again to express my grave concerns regarding the unlawful event center being built just 60 yards from my home in violation of the Williamson Act and many of our community's shared values and protections.

Let it be known: this project was illegal from the start.

The owner, Mr. Ghilotti, originally applied under the false premise of building an Ag Exempt barn misleading both city officials and his neighbors. As a direct neighbor, I witnessed multiple red tags and citations issued due to code violations. I also witnessed how these violations were ignored. This project was clearly never storing hay and farm equipment — it was an event center from day one. I personally saw the installation of oversized septic tanks close to the creek that feeds into two of my neighbors' ponds and eventually the San Antonio Creek. This raises major environmental red flags and could have long-lasting consequences.

The event center is not only incompatible with the land's zoning — it sets a dangerous precedent. This is protected agricultural land under the Williamson Act, which strictly limits development to agricultural or compatible use. Commercial event centers do not meet those standards. If this is allowed to go forward, you are sending a message that the Williamson Act can be ignored, manipulated, and bypassed by simply building first and seeking forgiveness later.

Let's be clear: the community is not silent. Mr. Ghilotti's claim that "only three people objected" is both inaccurate and insulting. Everyone I've spoken to in the valley opposes this project. Several years ago, one of my neighbors was forced to dismantle their barn after being told it was too close to the river — and they complied. Now we're expected to accept that someone can build an event center under the guise of an agricultural project, and not only be allowed to keep it, but potentially receive a retroactive permit?

The project also raises critical safety concerns. No traffic study has been conducted on San Antonio road, despite plans for 22 events per year, each allowing up to 200 people and 90 cars, resulting in 180 trips per event day. San Antonio road recently saw a high-speed car crash leaving us with no power throughout the cold night, near the proposed site. We also live in a high fire-risk zone, and have experienced two wildfires in just two years. One of them being on Mr. Ghilotti's property. It took three planes, one helicopter, 10 firetrucks, 35 men and women to contain that fire. If it wasn't for CalFire, his property, the event center and the grooms barn would have been completely lost, along with the hilltop adjacent to his property, where is virgin land with an extensive array of wild animals. Most definitely, an event center adds to this risk — especially in a region where fire services may not be able to respond immediately in the summertime.

On top of that, the property sits along a protected scenic route. The visual and environmental disruption of an event center with constant traffic, noise, and activity undermines its designation and beauty.

If you approve this permit — after construction is already complete — I will assume the same consideration will be extended to me when I decide to build or pursue activities on my property, which is *not* under the Williamson Act. I expect equal treatment and fair application of the law. I ask that this letter be entered into the official record, should I need to refer to it in the future.

Finally, I want to emphasize: Mr. Ghilotti and his family are developers. He purchased this land fully aware of its Williamson Act designation. If this event center is approved and he's allowed to operate commercially, will he also continue receiving the Williamson Act's tax benefits? If so, Mr. Ghilotti will not only have broken the law — he will have profited from it.

This is more than a building — it's a matter of fairness, integrity, environmental stewardship, and respect for the law.

I urge you to take a hard look at this situation and reconsider the dangerous precedent this project could set for our entire community.

Sincerely,  
**Guillermo Duran.**

**TO:** Joshua Miranda, Project Planner, Permit Sonoma  
Joshua.Miranda@sonoma-county.org

**CC:** Commissioners David Rabbitt, Larry Reed, Shaun McCaffery, Eric Koenigshofer, and  
Tennis Wick. Permit Sonoma Director

**RE: Permit Sonoma File No. PLP24-0012 (UPE21-0064, ZPE24-0113, ZPE24-0114**

I am writing to **OPPOSE** the Villa Vanto Farm project

I have lived on D Street since 1982 and have witnessed a significant increase in vehicular traffic over 42 years. It seems like *Death by a Thousand Cuts*. Every few years there is a proposal to build homes, venues, attractions and other traffic generating projects accessed via D Street.

I oppose this proposed project for the following reasons:

1. The proposed use appears to violate the regulations of the Williamson Act which limits land use to “include such things as agricultural labor, housing, water facilities, or electrical generation facilities.” The Use Permit being sought will “allow 22 annual agricultural promotional events ranging in size from 40 – 200 attendees.” It’s inconceivable to me that this is a realistic, true and honest proposal. Events to promote a “Lavender Farm?” This seems laughable at best and certainly violates, if not the letter of the Williamson Act, then its intent,
2. The traffic study fails to mention that D Street Extension is a designated truck route. Many heavy trucks pass by this site every day. The turn-off from D Street to the site will be dangerous for vehicles and bicycles.
3. The traffic study estimates that one-half the attendees at events at Villa Vanto will use San Antonio Road. I am a bicyclist and ride on San Antonio at least once every week year-round. The road lacks shoulders and is in poor condition, making riding difficult at the best of time.
4. The traffic study suggests that the project will not use trucks (0.0%). I find this hard to believe, as there will undoubtedly be catering vehicles, food and furniture suppliers, etc. for the events. This, to me, casts doubt on the legitimacy of the traffic study.
5. D Street, as I’ve noted, is already seriously impacted by vehicular traffic. It is currently being tested as a Class II bike lane and, if implemented, will experience an increase in bicycle use. D Street is narrow. To accommodate the bike lanes, the City

have limited parking and reduced the lane width to 9 feet (narrower than most large trucks, RVs and trailers). I have witnessed and experienced many close encounters with vehicles while riding my bike on D Street. The proposed Villa Vanto project will only escalate this dangerous situation.

If the County approves this proposal, you will bear responsibility for reducing public safety, creating hazardous conditions, and increasing chances for serious vehicular accidents. Not to mention the violation of the Williamson Act.

Robert Bailey  
915 D Street  
Petaluma, CA 94952  
RHBailey@Sonic.net  
707-480-8445

**From:** [Comcast2](#)  
**To:** [Joshua Miranda](#)  
**Subject:** File PLP24-0012 Mario and Katherine Ghilotti Revised Mitigated Negative Declaration  
**Date:** Wednesday, April 23, 2025 1:43:18 PM

---

**EXTERNAL**

Tom Atwood  
4490 D Street Ext  
Petaluma, Ca 94952  
Cypress\_abbey@comcast.net  
707-217-3456

April 23, 2025

Sonoma County Board of Zoning Adjustments  
Permit Sonoma  
2550 Ventura Ave  
Santa Rosa, Ca 95403

Dear Commissioner Miranda,

I am writing to express my support for Mario and Katherine Ghilotti and their business venture, Villa Vanto Farms, which they are hoping to launch within our community.

Owning property directly across from and having known Mario and Katherine for a few years, I can personally attest to their commitment to contributing positively to our neighborhood. Their proposed business is not only thoughtfully planned but also aligns with the values and character of our community.

I believe this venture has the potential to enhance our local area, provide valuable services to residents, and foster a sense of connection among neighbors.

I hope the board will consider supporting this initiative and recognize the positive impact it can bring to our neighborhood.

Thank you for your time and consideration.

Sincerely,

Tom Atwood

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.





**SONOMA GROUP OF THE  
REDWOOD CHAPTER**

P.O. Box 466  
Santa Rosa, CA 95402

[sierraclub.org/redwood/sonoma](https://sierraclub.org/redwood/sonoma)

September 3, 2024

Supervisor David Rabbitt  
Director Tennis Wick, Permit Sonoma  
575 Administration Drive  
Santa Rosa, CA

VIA EMAIL

RE: Oppose Change of Use Permit, Ghilotti Project in San Antonio Valley, APN 020-130-037 Permit Application UPE21-0064, Permit Sonoma File # PLP24-0012

Dear Supervisor Rabbitt and Director Wick,

Sierra Club Sonoma Group is writing in support of extensive comments submitted to date by the community group Protect San Antonio Valley to oppose the granting of Use Permit UPE21-0064 on the Ghilotti property at 4485 D Street Extension, Petaluma, in San Antonio Valley that would convert agricultural land protected under the Williamson Act to an event center that is incompatible with longstanding land use and zoning restrictions in Sonoma County.

Sierra Club is concerned that approving this use permit would set a troublesome precedent allowing other landowners to ignore county and state land use policies and regulations and convert important farmland to non-agricultural commercial purposes. This would effectively sabotage the County's General Plan, applicable land use zoning restrictions, and the Williamson Act.

The County of Sonoma and the state of California continue to lose productive farmland and grazing lands to commercial development and urban sprawl at an alarming rate. California is losing 50,000 acres of agricultural land annually, according to the California Department of Conservation.

While Sonoma County has some of the strongest protections for agricultural land in the state due to voter approved Urban Growth Boundaries, Community Separators and the taxpayer funded Agricultural and Open Space District, we remain at ongoing risk of farmland conversion to non-agricultural uses, often parcel by parcel, such as this project.

As you know, the applicants violated Sonoma County land use and zoning restrictions when they built an event center to host weddings and events. The applicants now claim that the event center building will be used primarily for agricultural purposes, namely, to dry, process and sell lavender grown on their "lavender farm," and to store various agricultural equipment. However, despite having invested heavily in

constructing the event center and surrounding party spaces, there is no sign of any lavender planted on the ranch. And the cattle that used to graze on the ranch are gone. Other than three horses in a corral, there appears to be no agricultural activity.

The application for Use Permit UPE21-0064 requests allowance for up to 28 events annually, including weddings, corporate gatherings and charity fundraisers, the primary purpose of which the applicants claim will be to promote lavender sales. These types of events do not comply with the Land Extensive Agriculture (LEA) zoning under the Sonoma County General Plan. They are neither agricultural promotional events nor secondary or incidental to agriculture as required by the zoning regulations. Even if the applicants do plant lavender someday, the obvious primary purpose of this project is to host events, not to promote lavender.

Finally, this property has been under a Williamson Act contract since 2002, well before the applicants purchased it. The building's large size and custom design as an event center constitutes a material breach of the Williamson Act, which is intended to preserve agricultural land and provide tax benefits to active farmers and ranchers – not commercial developers and speculators.

Based on the above, we respectfully request that this use permit application be denied. This outcome will support adherence to County and State laws, and the farmers and ranchers who comply with them.

Sincerely yours,

A handwritten signature in cursive script that reads "Teri Shore". The signature is written in black ink and is positioned below the "Sincerely yours," text.

Sonoma Group Executive Committee

Shirley Johnson, Chair; Teri Shore, Tom Conlon, Theresa Ryan, Dan Mayhew



April 23, 2025

Re: PLP24-0012

Dear Commissioners,

We appreciate your continued engagement on this Use Permit application.

We recommend that you deny the Use Permit.

We have submitted a significant amount of factual material illustrating the ways this Use Permit would violate the Sonoma County General Plan and the Williamson Act, citing zoning codes and ordinances. (See Tab 20 in the 2-27-2025 hearing packet.)

Many other organizations and individuals (a partial list is attached) have taken similar positions in opposition.

Let's focus on the big picture.

**Granting a Use Permit Now Doesn't Make Sense.**

Granting a Use Permit to allow events to promote products that don't currently exist, on a property that has no agriculture, to applicants with no farming experience, whose farming plans continue to change, and who built an Event Center with an Ag Exempt permit, does not make sense.

- No farming has begun on the property. No lavender. No olive trees. (The applicants have owned the property for more than 4 years.)
- Events cannot be "secondary and incidental to agriculture" when there is no agriculture.
- Permit Sonoma issued a violation on the property for "advertising and operating an Event Center" on Williamson Act land. How can the applicants advertise and operate events in the same dedicated Event Center now, on non-productive land, and not be in violation of the Williamson Act?

- The applicants are developers. They have no farming experience, nor any experience processing or distilling crops (see attached bios).

The Use Permit would run with the land. Granting a Use Permit would dramatically and permanently change the character of this rural land. It would set a terrible precedent that event centers can be built on ag-zoned land with no agriculture. It would allow a few individuals to flout applicable laws and regulations and profit while having Sonoma County taxpayers subsidize their property taxes.

Common sense requires the lavender and olive farm to be operational and productive before its products are promoted with visitor-intensive events. To do otherwise would put the cart miles before the horse.

If this Use Permit is denied, we hope the applicants will apply for retail sales and production zoning permits, and we have no objection to those. Our understanding is that many of the “immersive experiences” and farm educational tours they describe in their materials would be allowed under such permits.

Thank you for your consideration in this matter.

Sincerely yours,

Members of Protect San Antonio Valley

(Attachments)

## **Individuals and Organizations Opposing PLP24-0012**

Below is a partial list of people and organizations that are currently on record opposing Applicant's Use Permit Application.

### **Organizations**

Sierra Club Sonoma Group  
Bennett Valley Residents for Safe  
Development  
Concerned Citizens of Bloomfield  
Friends of Franz Valley  
Neighborhood Coalition, Sonoma  
County  
Neighbors of West County  
Preserve Rural Sonoma County  
Protect San Antonio Valley  
West County Rural Alliance

### **Nearby Neighbors**

Katie LaVignia  
Tom Gawronski  
Anne DeChelbor  
Mark Carpenter  
Elizabeth Carpenter  
Michael Mayo  
Guillermo Duran  
Deirdre Hockett  
Chris Hockett  
Cara Marchando  
Jeff Daniel

### **Others**

Lacey LaVignia  
Adam LaVigna  
Ron LaVigna  
Stephanie LaVigna  
Robert Bailey  
Mark Bommersbach  
William Byrne  
Nancy Feehan  
Moirra Jacobs  
Bill Krawetz  
Mary Plimpton  
Vi Strain  
Gina Cloud

**Applicant Backgrounds**  
(from their website [www.vero-west.com](http://www.vero-west.com))

**Mario Ghilotti**

Mario Ghilotti is the Founder and Managing Partner of Vero West Inc., overseeing the firm's investment focus and strategic partnerships. As a 4th generation native to Marin County, Mario grew up in the construction trenches, working night shifts in high school as a grease truck driver, laborer, and operator. He has served on the Board of Directors for Ghilotti Bros., Inc., focusing on operations, strategic real estate, and vertical business acquisitions and oversaw the operations of \$600MM in civil construction and site work. Mario fostered key public and private relationships with repeat clients by timely delivering complete infrastructure packages to clients like Kaiser Permanente, City Ventures, Graton Casino, Replay Mill District, Caltrans, Google, Genentech, SMART, and local City public works projects. With a diverse range of project management skills, Mario adeptly handles clients from local municipalities, state and federal government agencies to private developers.

Mario was raised in Marin County and graduated with a BS in Construction Management from Cal Polytechnic University San Luis Obispo. Residing on his ranch in Petaluma with his wife and son, he enjoys raising and breeding quarter horses for cutting competition with the NCHA and NRCHA.

**Katherine Ghilotti**

Katherine Ghilotti is the Co-Founder and Director of Design of Vero West Inc. Katherine actively leads all design elements for Vero West's development projects. Katherine comes from three generations of private family office real estate holdings. In the early 90's, the family office was the largest private owner of multifamily in the East Bay.

Graduating magna cum laude in Chemistry and Pre-Med from the University of San Diego, Katherine's work as COO at Medical Spa Skin Presence has been invaluable in building her analytical mindset.



**From:** [Michael Mayo](#)  
**To:** [Tim Freeman](#); [Larry Reed](#); [Pat Gilardi](#); [Evan Wiig](#); [Chuck Striplen](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Tennis Wick](#); [Joshua Miranda](#)  
**Cc:** [Michael Mayo](#)  
**Subject:** Proposed 4485 D Street Extension Event Center, Petaluma  
**Date:** Wednesday, April 23, 2025 3:44:03 PM

---

## EXTERNAL

April 23, 2025

TO:

Commissioner S. McCaffery Commissioner E. Koenigshofer  
Commissioner L. Reed Commissioner J. Kapolchok  
Tennis Wick - Permit Sonoma Josh Miranda - Permit Sonoma

FROM:

Michael Mayo/1000 Longhorn Lane, Petaluma

RE: Proposed 4485 D Street Extension Event Center, Petaluma

Dear Planning Commissioners,

I live in the San Antonio Valley near the Ghilotti property. While I have no problem with a lavender production operation, I am opposed to the non-agricultural events (weddings, "customer events", etc.) in the use permit request. The Ghilottis' have been very dishonest with their neighbors, building an event center on Williamson Act land and in the face of neighborhood opposition are now attempting to work around existing restrictions. Despite owning the property for approximately 4 years, there is NO lavender onsite, their focus is creating an event center for weddings with a minimum \$50,000 rental fee.

The Ghilotti's advertised their unpermitted wedding event center extensively on social media and in doing so, generated significant local opposition. In an attempt to minimize this

opposition, the social media was scrubbed, and the project suddenly became a lavender production facility. They created and distributed a brochure describing a neighborly operation but decidedly omitted any mention of weddings or other non-agricultural events. I am attaching copies of the brochure and cover letters for your review.

Please note the following discrepancies:

**Pamphlet Description (What about events?):**

"We plan to craft events- up to 25 a year- that will educate guests on sustainable, drought tolerant farming practices through an immersive experience in how we cultivate and process the lavender. At the end, the guests will have the opportunity to create a custom scent using essential oils and will be required to purchase products from the farm. We'll also be educating guests on the healing properties of essential oils and sponsoring charity events for organizations with members who might be served by aromatherapy."

**Use Permit Application:**

"The building and outdoor areas developed around the structure are proposed to be used for periodic restricted **non-agricultural** promotional events. Up to 25 events annually are proposed.

The following types of promotional events are proposed annually:

15 private parties, reunions, weddings (80-200 attendees)

10 customer, educational, marketing, farm to table events (40-120 attendees)

2 charity fundraising events (50-150 attendees)

1 industry related event (40-120 attendees)"

They lie to us and they are lying to you. This has always been an event center, lavender production is just a red herring.

Please deny all non-agricultural events.

Respectfully & best regards,

Michael Mayo  
1000 Longhorn Lane  
Petaluma, CA. 94952

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Leslie Mikulich](#)  
**To:** [Joshua Miranda](#)  
**Subject:** La Vigna Ranch  
**Date:** Wednesday, April 23, 2025 4:16:40 PM

---

## EXTERNAL

Hello. I am opposed to any commercial development in rural San Antonio Rd. These kind of event centers belong in urban areas. The road will be impacted by traffic, bicycles using the road will be threatened. since the area has been impacted by fire recently the country road is not equipped for emergencies. There is a right way to handle things and a wrong way. Make the right choice and keep agricultural land alone Leave them this way and move event centers to urban areas. Leslie Mikulich  
DVM

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Leslie Mikulich](#)  
**To:** [Joshua Miranda](#)  
**Subject:** La Vigna Ranch  
**Date:** Wednesday, April 23, 2025 4:22:21 PM

---

**EXTERNAL**

Hello. I am opposed to any commercial development in rural San Antonio Rd. These kind of event centers belong in in urban areas. The road will be impacted by traffic, bicycles using the road will be threatened. since the area has been impacted by fire recently the country road is not equipped for emergencies. There is a right way to handle things and a wrong way. Make the right choice and keep agricultural land alone Leave them this way and move event centers to urban areas alone. Leslie Mikulich DVM

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Linda Wilson](#)  
**To:** [Joshua Miranda](#)  
**Subject:** PLP24-0012 - Address 4485 D Street Extension, Petaluma  
**Date:** Wednesday, April 23, 2025 4:41:34 PM

---

**EXTERNAL**

Joshua Miranda,

**PLP24-0012 - Address 4485 D Street Extension, Petaluma**

April 23, 2025

Re: Ghilotti Project at APN 020-130-037; Use Permit Application UPE21-0064

Dear Mr. Rabbitt, Ms. Gilardi, Mr. Reed, Mr. Wick, Ms. Harrington, Mr. Franceschi, and Mr. Hernandez,

I am writing to express our opposition to the extensive development at 4485 D Street Extension in Petaluma, and the Use Permit Application (UPE21-0064) recently submitted for this property. While I appreciate the County's enforcement actions to date, they appear to have made little to no difference in how the applicants are developing and using the project. As described below, the developers of this site continue to disregard and abuse State and County laws, zoning regulations, and building codes.

The objections are based on the following:

- The applicants' 5,000 square foot barn, constructed under an Ag Exempt permit in 2021 and later cited by Permit Sonoma for multiple code violations, is being used as an Event Center ([www.villavanto.com](http://www.villavanto.com)).
- The proposed uses of the Event Center, including 28 events – weddings, corporate events, and fundraisers – for up to 4,600 attendees annually, do not comply with LEA zoning under the Sonoma County General Plan LEA land use category. They are not agricultural promotional events and are not secondary or incidental to agriculture.
- The events are not Temporary Events under Restricted Nonagricultural Uses for LEA land under the Sonoma County Code of Ordinances.
- The requested Use Permit and zoning modification would “run with the land” and therefore should not be permitted.
- The building is a Material Breach of the Williamson Act, given its size and primary use as an event venue.

Thank you.

Linda Wilson  
Sonoma County Taxpayer and Land Owner

**THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.**

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.



**From:** [Norma YUKICH](#)  
**To:** [Joshua Miranda](#); [Larry Reed](#); [Shaun McCaffery](#); [Eric.Koenigschofer@sonoma-county.org](#); [David.Rabbit@sonoma-county.org](#); [Tennis Wick](#)  
**Subject:** PLP24-0012 - Address 4485 D Street Extension, Petaluma.  
**Date:** Wednesday, April 23, 2025 4:47:49 PM

---

## EXTERNAL

I am writing to express my opposition to the development of the above referenced property as an event center. In addition to the property owners' repeated disregard to obtaining necessary permits, and the deceitful manner in they which built a luxurious "agricultural barn," with chandeliers and kitchen facilities, the location itself is inappropriate. The access to and from the property is on narrow and twisty two-lane roads, increasing the risk of car wrecks, especially after drivers celebrate with alcoholic beverages. Finally, people in Sonoma County have learned from tragic experience of the dangers of such roads during emergencies such as wildfire evacuations. Hosting events at this property may increase the risk of a fire starting, and having dozens of additional vehicles on these roads would certainly increase the hazards of evacuating.

Sincerely,  
Norma Yukich

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Donna Lamke](#)  
**To:** [Joshua Miranda](#)  
**Subject:** PLP24-0012 4485 D Street Extension, Petaluma  
**Date:** Wednesday, April 23, 2025 4:45:51 PM

---

**EXTERNAL**

Dear Project manager Miranda and commissioners, Board of Supervisors, and Permit Sonoma Director Wick:

I am writing to oppose proposed developement project (APN 020-130-037) at 4485 D Street extension.

This is an agricultural area, and not appropriate for a high volume event center, or high attendance events. The roads accessing this site are narrow, windy, and would NEVER allow for safe evacuation in the event of fires, which have occurred in this area!

This property is zoned for agricultural use! Weddings, corporate events, fundraisers with high attendance are not in compliance with the current zoning for this property.

I request, as a citizen concerned with public safety, that this permit be denied.

Donna Lamke, RN

**THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.**

**Warning:** If you don't know this email sender or the email is unexpected,  
**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [nancy maddox](#)  
**To:** [Joshua Miranda](#)  
**Subject:** Proposed opening for project  
**Date:** Wednesday, April 23, 2025 5:02:06 PM

---

EXTERNAL

4/23/25

I oppose this project for many safety reasons.

Thank you for this consideration

Sincerely,

Resident

Nancy Maddox

Sent from my iPhone

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,  
do not click any web links, attachments, and never give out your user ID or password.

**From:** [nancy maddox](#)  
**To:** [Joshua Miranda](#)  
**Subject:** PLP24-0012 - Address 4485 D Street Extension, Petaluma.  
**Date:** Wednesday, April 23, 2025 5:09:06 PM

---

EXTERNAL

Dear sir,  
I neglected to add the subject matter of my previous email dated 4/23/25.  
Thank you again for this consideration.  
Sincerely,  
Resident  
Nancy Maddox  
Sent from my iPhone

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.  
Warning: If you don't know this email sender or the email is unexpected,  
do not click any web links, attachments, and never give out your user ID or password.

**From:** [Katie LaVigna](#)  
**To:** [Joshua Miranda](#); [Larry Reed](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [David Rabbitt](#)  
**Subject:** PLP24-0012  
**Date:** Wednesday, April 23, 2025 5:07:59 PM  
**Attachments:** [Brochure 3.pdf](#)  
[Brochure 4.pdf](#)  
[Brochure.pdf](#)  
[Brochure 2-2.pdf](#)

---

## EXTERNAL

The attached brochure was distributed to the neighbors in May 2024. In the brochure there is a section "What About Events?" Here is the description

"We plan to craft events-up to 25

a year- that will educate guests on sustainable, drought-tolerant farming practices through an immersive experience in how

we cultivate and process the lavender. At the end, guests will have the opportunity to create a custom scent using essential oils, and will

be required to purchase products from the farm. We'll also be educating guests on the healing properties of essential oils and sponsoring charity events for organizations with members whomight be served by aromatherapy"

However the events being requested in the Use Permit are as follows:

"The building and outdoor areas developed around the structure are proposed to be used for periodic restricted non-agricultural promotional events. Up to 22 events annually are proposed.

The following types of promotional events are proposed annually:

- 13 Private Parties, Reunions, Weddings (80-200 attendees)
- 7 Customer, Educational, Marketing, Farm to Table Events (40 -120 attendees)
- 1 Charity Fundraising Events (50-150 attendees)
- 1 Industry related event (40-120 attendees)"

As you can see there is a significant difference between the description of events in the brochure and what is actually being requested. While the brochure describes education in farming and immersive experiences, the Use Permit application lays out a very different objective.

--

I'm concerned that the brochure misrepresents the applicants intentions.

Thank you, Kathleen Lavigna  
707-953-4425

--

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.



VILLA VANTO



# Farming the future of well-being

The freshly-planted lavender fields at Villa Vanto are just the beginning of a beautiful vision coming to fruition.

PICTURED ABOVE: 10 acres of hillside will be planted to English lavender

4485 D STREET EXT.  
PETALUMA, CA



## What is the primary focus of Villa Vanto?

The primary purpose of the farm is to cultivate, harvest, and process lavender. While the property was historically a dairy farm, the land has lain fallow for decades, and the steep, hilly terrain makes it difficult to farm. Lavender is a drought-resistant crop that thrives under these challenging conditions. Villa Vanto will have 10 acres of lavender planted in rows on terraced platforms. Eventually, we may seek to supplement the crop by leasing additional acreage from local property owners who currently aren't using their land for agricultural purposes.

The barn will be used for lavender storage, processing, and packaging



## What about events?

The events at Villa Vanto will be intertwined with, and secondary to, the agricultural use of the land. As a small-scale producer of a specialty crop, we need a direct-to-consumer outlet in order for the operation to be financially viable. We plan to craft events – up to 25 a year – that will educate guests on sustainable, drought-tolerant farming practices through an immersive experience in how we cultivate and process the lavender. At the end, guests will have the opportunity to create a custom scent using essential oils, and will be required to purchase products from the farm. We'll also be educating guests on the healing properties of essential oils and sponsoring charity events for organizations with members who might be served by aromatherapy.

## What will the barn be used for?

The barn is where we'll store and dry the lavender after harvest; process the lavender into essential oil and hydrosol; and package the products to take to market.





On-site events  
will educate guests  
on sustainable  
agriculture and  
lavender production,  
and be a primary  
outlet for sales

# Small-scale farming model

The Villa Vanto ethos is rooted in the belief that building a sustainable future encompasses not only environmental stewardship but also a sound economic business model that enriches the well-being of all those it touches.



## SUSTAINABLE LAVENDER PRODUCTION

Eight acres are currently being planted to lavender, along with various herbs and flowers both for product use and for companion planting and cover crops. Keeping the yield small allows space for giving full attention to the details involved in closed-loop agriculture. Attracting bees for pollination through cover crops, installing owl and bat boxes to foster natural pest control, and paying close attention to water usage through water recycling, for example.



## LAVENDER PRODUCTS

Villa Vanto's organic lavender crop will be used to produce lavender products on-site. Operations will start with Villa Vanto-branded essential oil, hydrosol, culinary lavender, and lavender sachets.



## IMMERSIVE EXPERIENCES

A foundational piece of the Villa Vanto vision is crafting immersive experiences on the property. This is both to enhance the perception of Villa Vanto products and to open people's eyes to a lifestyle where personal wellness and responsible agriculture go hand in hand.



# Our vision for the future



## Culinary and wellness events

Future events at Villa Vanto will deepen the immersive experience. We intend to seek out guest experts that further a holistic way of living. We envision a space with raised garden beds and plan on partnering with local chefs for seasonal farm-to-table dinners.

Villa Vanto will be the first perfumery house in Sonoma County where a limited number of guests will be able to see how perfume is made and walk the land it comes from. As a creative alternative to winery tasting rooms, it's a fresh, forward-thinking approach to agrotourism.



## Partnerships with local growers

As the Villa Vanto vision takes shape, we hope to partner with local growers and ranchers to build community and creative collaboration.

With land prices what they are in Sonoma County, coupled with the realities of climate change and a prolonged drought, the barriers to entry for farming are often too high to be viable. With Villa Vanto, we hope to be a model for approaching farming in a new way, inspiring a fresh generation of farmers to build thriving businesses through creative approaches to challenging land.