



**PLANNING COMMISSION /  
BOARD OF ZONING ADJUSTMENTS APPEAL FORM**

**PJR-021**

To: Board of Supervisors  
County of Sonoma, State of California

File No.: UPE21-0042

Appeal is hereby made by Jay Zalewski, Charlie Martin, Albert Merck, John RoseKrans

Mailing Address 13426, 13424, 13412, 13430, 13420 Chalk Hill Road

City / State / Zip Healdsburg, CA 95448

Phone: 4156527121 Email: jayzalewski@gmail.com

The Sonoma County  Planning Commission /  Board of Zoning Adjustments on  
(date) August 14th, 2025

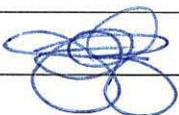
approved /  denied a request by Medlock Aimes Winery  
for minor use permit - winery expansion, tasting room, and events.

Located at 13414 Chalk Hill Road

APN 132-120-017 and 018 Zoning: LIA B6 40 Z, OAK RC100/50 Supervisorial District: 4

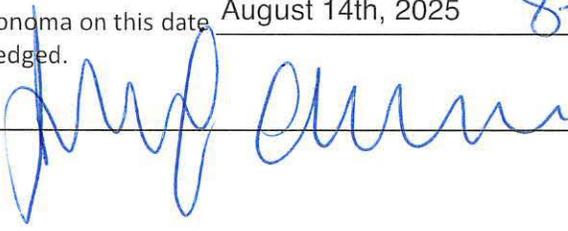
This appeal is made pursuant to Sonoma County Code Chapter Section 26-92-160 for the following specific reasons:

Please see the attached.

Appellant Signature  Date: 8/21/2025

DO NOT WRITE BELOW THIS LINE - TO BE COMPLETED BY PERMIT SONOMA STAFF

This appeal was filed with Permit Sonoma on this date August 14th, 2025 8-22-25  
receipt of which is hereby acknowledged.

Permit Sonoma Staff Signature 

# CEQA Appeal Letter – Medlock Ames Winery Expansion (UPE21-0042)

**To:** Sonoma County Planning Commission / Board of Supervisors

**From:** Jake Zalewski, Charlie Martin, Al Merk, John Rosekrans, Roger McDermont

**Date:** August 21, 2025

**Re:** Appeal of Use Permit with Environmental Review (UPE21-0042) – Medlock Ames Winery Expansion

---

Our primary concern is the serious risk to public safety created by allowing nearly 19,000 additional vehicle trips annually on Toby Lane, a narrow, winding, one-lane private road with blind curves, limited turnouts, and steep grades. This road was never designed to accommodate high traffic volumes and is already hazardous for daily residential use. Introducing winery traffic—including visitors, delivery trucks, and event vehicles—will significantly increase the likelihood of accidents. More importantly, Toby Lane lies within a high fire danger area. In the event of a wildfire, safe evacuation would be jeopardized by the influx of vehicles, locked gates, and the absence of adequate alternative escape routes. It appears the residence safety are not being considered in evacuation plans. If a fire were to break out, how would those who live here get out if the winery had an event with 50 vehicles trying to all exit at the same time. The County’s approval of this project places both residents and visitors at unacceptable risk.

## I. Introduction

We are adjoining property owners and easement holders directly affected by the proposed Medlock Ames winery expansion. We hereby appeal the approval of UPE21-0042 on the grounds that:

1. The project was improperly processed as a **Minor Use Permit (UPE)**, despite impacts and scale that require **full Conditional Use Permit (CUP) review**.
2. The County’s adoption of a Mitigated Negative Declaration (MND) fails under CEQA’s “fair argument” standard, as substantial evidence exists that the project may cause significant environmental impacts.

---

## II. Improper Permit Level – UPE vs. CUP

The County processed this application under the UPE track — essentially a Minor Use Permit handled administratively. That pathway is reserved for projects of limited scope and low impact. By contrast, this winery expansion proposes:

- 30,000 case production,
- a new public tasting room,
- regular daily visitor traffic,

- promotional events (12 per year),
- expanded hours into the evening.

These are **not “minor” impacts**. They trigger substantial **traffic, safety, and fire evacuation issues** on a narrow private easement road. The scale and intensity of use clearly warrant **full CUP review** by the Planning Commission, not staff-level approval.

---

### III. CEQA Fair Argument Standard

CEQA requires preparation of an Environmental Impact Report (EIR) whenever there is a “fair argument” supported by substantial evidence that a project may cause a significant environmental effect. The threshold is intentionally low.

Substantial evidence exists here of:

1. **Traffic and Road Safety** – Winery traffic would funnel visitors, delivery trucks, and event vehicles onto a narrow private easement with blind curves, no turnouts, and unpaved segments. This is a recognized CEQA traffic hazard.
  2. **Fire and Emergency Access** – The road is the only evacuation route. The Fire Department approved the project **but it begs the question**, what was the basis deeming it “safe”? We challenge this decision and would welcome a representative from the fire department to meet and discuss their findings as we share the dangerous parts of the road.
  3. **Supervisor’s Office Inspection** – District 4 Supervisor Gore’s office will be independently investigating the road conditions, and we believe will be reflecting serious unresolved concerns about safety and adequacy.
  4. **Noise, Dust, and Air Quality** – Increased vehicle trips and outdoor winery activities will introduce new dust and noise impacts on neighboring properties.
  5. **Water Supply and Wastewater** – The project proposes increased water and wastewater loads without adequate cumulative analysis.
  6. **Cumulative Impacts** – Multiple wineries and ag-tourism projects in the vicinity create significant combined effects that have not been studied.
- 

### IV. Easement Limitations

Separately, we emphasize that this project relies on a **private ingress/egress easement**. A CUP (or UPE) **cannot enlarge private easement rights**. Using the road for customer traffic, event attendees, and heavy trucking is a change in kind, not mere intensification, and constitutes an overburden.

Even if the permit is approved, we expressly reserve our rights to pursue private legal remedies to prevent overburdening of the easement.

---

### V. Requested Action

For these reasons, we respectfully request that the County:

1. **Rescind approval of UPE21-0042;**
  2. Require that any winery expansion of this scale be processed as a **Conditional Use Permit (CUP)** subject to full Planning Commission review;
  3. Require preparation of a full **Environmental Impact Report (EIR)** to address traffic, safety, water, wastewater, fire evacuation, and cumulative impacts;
  4. Impose enforceable conditions of approval if the project proceeds.
-

## VI. Conclusion

For these reasons, we respectfully urge the Board of Supervisors to overturn the Planning Department's approval of UPE21-0042. The scale and impacts of the proposed winery expansion are far too great to be processed as a "minor" use permit. A full Conditional Use Permit review and Environmental Impact Report are warranted to evaluate the very real threats to traffic safety, fire evacuation, water resources, and neighborhood character. Proceeding without such safeguards not only undermines CEQA's requirements but also endangers the lives of residents and visitors alike. We therefore ask that the County rescind this approval and require comprehensive review before any project of this magnitude is allowed to proceed.

Respectfully submitted,

Jay Zalewski  
13426 Chalk Hill Road

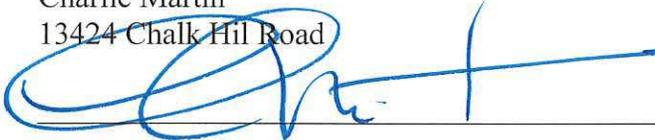


Signed

8/21/25

Date

Charlie Martin  
13424 Chalk Hill Road



Signed

8-21-2025

Date

Al Merck  
13412 Chalk Hill Road



Signed

8/21/25

Date

John Rosekrans  
13430 Chalk Hill Road



Signed

8/21/25

Date

Roger McDermott  
13420 Chalk Hill Road



Signed

8/21/25

Date