



JULY 15, 2024

VIA EMAIL: JOSHUA.MIRANDA@SONOMA-COUNTY.ORG

JOSHUA MIRANDA, PLANNER III
SONOMA COUNTY
PERMIT AND RESOURCES MANAGEMENT DEPARTMENT
2550 VENTURA AVENUE
SANTA ROSA, CA 95403

Dear Mr. Miranda:

INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION FOR THE VILLA
VANTO FARM PROJECT, SCH# 2024070225

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Initial Study and Proposed Mitigated Negative Declaration for the Villa Vanto Farm Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents.

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process, and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The applicants propose a small-scale agricultural processing operation for processing of lavender grown onsite into various products. Most of the harvested lavender crops will be distilled into essential oils and hydrosol (similar to lavender water) within the existing agricultural barn structure. The remaining lavender will be dried and sold in its natural state for culinary and other uses. No lavender will be imported from any other

farms and all the proposed processing will be limited to products grown onsite. 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.

The agricultural barn structure will be used primarily for small scale agricultural processing. The lavender will be processed into essential oil and hydrosol through a distillation process that will occur within the inside the barn structure. The essential oil and hydrosol will then be processed, packaged, and stored within the structure to be sold. Additionally, lavender in its raw state will be dried in the building for the same purpose. The barn structure will also serve as storage for farm equipment, and machinery need for maintain the property.

The applicant proposes farm retail sales, that would occur within a 215 square foot portion of the existing agricultural barn. The products grown, processed, marketed, and packaged, including the lavender oil, hydrosol, sachets, bundles, and bath salts, on site will be for sale in this area.

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.

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 proposed project site is subject to a Land Conservation (Williamson) Act contract, recorded under Document No. 2002-206762.

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.

- 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.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- The project's compatibility with lands within an agricultural preserve and/or enrolled in a Williamson Act contract.

WILLIAMSON ACT

Where, as here, the project site is located on land subject to a Williamson Act contract, the Department advises that the environmental review discuss the compatibility of the project with the contract and local Williamson Act program requirements.

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."]; see also *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

Thank you for giving us the opportunity to comment on the Initial Study and Proposed Mitigated Negative Declaration for the Villa Vanto Farm Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber
Conservation Program Support Supervisor

State Water Resources Control Board

July 25, 2024

Joshua Miranda
Sonoma County
2550 Ventura Ave,
Santa Rosa, CA 95403

COMMENT LETTER ON THE SONOMA COUNTY(COUNTY), INITIAL
STUDY/MITIGATED NEGATIVE DECLARATION (ENVIRONMENTAL DOCUMENT)
FOR THE VILLA VANTO FARM PROJECT (PROJECT); STATE CLEARINGHOUSE #
2024070225

Dear Joshua Miranda:

Thank you for the opportunity to review the Environmental Document for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for regulating public water systems and issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the jurisdiction of the State Water Board, DDW's Marin District.

A public water system, as defined in the California Health and Safety Code (Health & Saf. Code) § 116275 subd. [h], is "a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year."

If the above noted project results in the formation of a public water system, an application must be submitted, and a permit must be obtained from the Marin District before water can be provided for human consumption. "Human consumption" means the use of water for drinking, bathing or showering, hand washing, oral hygiene, or cooking, including, but not limited to, preparing food and washing dishes." Health & Saf. Code § 116275 subd. [e].

Note, Health & Saf. Code § 116527 subd. (b) requires that any person submitting a permit application for a proposed new public water system must first submit a technical report at least six months before initiating construction of any drinking water-related improvements. The technical report must include an examination of the possibility of connecting to or being annexed by an existing adjacent community water system. Please see the attached What is a Public Water System flyer.

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act, has the following comments on the County's Environmental Document:

- The Environmental Document includes estimates for the water use of 200 people, two full-time employees, and eight part-time employees (PDF page 49). A residence also exists on site (PDF page 8) and 12 bedrooms are under construction (PDF page 4). The barn includes two - three restrooms (PDF page 5). This Project appears like it may meet the definition of a public water system. The State Water Board, DDW encourages projects like this to connect with nearby community water systems, where possible, instead of forming a new public water system. If no nearby system will agree to serve the Project, the applicant will need to submit a technical report to DDW pursuant to Health and Saf. Code § 116527 subd. (b). If feasible, it may be beneficial to discuss connecting to a nearby community water system in the Environmental Document.
- If a new public water system will be created by the Project:
 - Within "Table 2.", column "Agency" please add to the document "The State Water Resources Control Board, Division of Drinking Water" as an approving agency. Under "Activity" include "water supply permit" and under "Authorization" include "California Code of Regulations, Title 17 Public Health" (PDF pages 2 and 3).
 - Describe the existing and any new water system components that would be needed to become a new public water system and discuss impacts associated with construction and operation of the system, including but not limited to the following, as applicable:
 - Will the existing wells need to be rehabilitated or upgraded?
 - Will the existing three 5,000-gallon tanks fed by onsite springs be connected to the system? Is new water storage proposed? If so, include the tank dimensions and capacities.
 - Is water for fire protection provided by the domestic water system or will there be a separate non-potable supply for fire flow?
 - Please discuss the quality of the water and if any treatment may be required. If treatment is required, please consider the treatment infrastructure in the document.
 - Please include a map of the existing and proposed water system components or discuss where the components are or will be sited within the Project area, as applicable.
 - The document sources figures and tables from Appendix 1, The Biological and Regulatory Constraints Report, but fails to include Appendix 1. Please make this document available. Documents incorporated by reference must be made publicly available (Cal. Code Regs., tit 14, § 15150 [b]).
 - There appears to be an error in section 4. Biological Resources (c) When discussing substantial adverse effects on state and federally protected wetlands through direct removal, filling, hydrological interruption, or other means (PDF page 38). The last statement of the discussion states that

“no impacts” to aquatic resources will occur as the aquatic resources do not meet the definition of a wetland even though it was stated earlier that the resources meet the Water Board’s definition of a wetland. The discussion also includes a final determination of less than significant impact which contradicts “no impacts.” Please clarify the discussion and conclusion.

- A National Pollutant Discharge Elimination System permit and waste discharge permits may help reduce project impacts to water quality. Under section 10. Hydrology and Water Quality, (a.) when discussing if the Project will violate water quality standards and waste discharge requirements:
 - It is mentioned that the project is not within the designated National Pollutant Discharge Elimination System area (PDF page 48). However, the document also mentions that pond, adjacent wetlands, and tributaries (which are within the site) are connected during significant stormwater flow events to an unnamed tributary and San Antonio Creek (PDF page 37). A National Pollutant Discharge Elimination NOI is also listed under Table 2 (PDF page 5). Please discuss the amount of soil that will be disturbed and if the NPDES permit will be needed. Please then clarify the first statement and/or the permit listing in Table 2.
 - Please discuss if waste discharge permits would be required for discharges to aquatic resources delineated within the Project site as Waters of the State.

Once the Environmental Document is adopted, please forward the following items in support of water system’s permit application to the State Water Board, DDW Marin District Office at DWPDISTRICT25@waterboards.ca.gov:

- A copy of the Environmental Document, Mitigation Monitoring and Reporting Plan, comment letters received, and the lead agency responses as appropriate.
- A copy of the Resolution or Board Minutes adopting the Environmental Document and Mitigation Monitoring and Reporting Plan; and
- A copy of the date stamped Notice of Determination filed at the County Clerk’s Office and the Governor’s Office of Planning and Research, State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Sincerely,

Lori Schmitz
Environmental Scientist
Division of Financial Assistance

Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Elena Joy M. Pelen
District Engineer
Marin District

Jaux Wildflower
Sanitary Engineer
Marin District

From: [Hansen, James@Wildlife](mailto:Hansen_James@Wildlife)
To: [Joshua Miranda](mailto:Joshua.Miranda)
Subject: RE: Villa Vanto Farm MND Comment
Date: Wednesday, July 31, 2024 9:04:26 AM
Attachments: [image001.jpg](#)
[image002.png](#)

EXTERNAL

Hi Josh,

Yes, adding to Bio-11 is great.

Thank you!
James

From: Joshua Miranda <Joshua.Miranda@sonoma-county.org>
Sent: Tuesday, July 30, 2024 6:07 PM
To: Hansen, James@Wildlife <James.Hansen@Wildlife.ca.gov>
Subject: RE: Villa Vanto Farm MND Comment

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

James,

Would you agree that we could modify Mitigation Measure Bio-11 (pasted below) to include the LSA agreement language you are proposing or would you like to see a standalone mitigation measure. If you would like to see a standalone, could you please for the record write your comments into a letter head for our administrative record.

Mitigation Measure BIO-11, Temporary Construction Impacts: Recommended mitigation measures to minimize temporary construction impacts include:

1. Ground disturbing work to be conducted during dry or low-flow periods; if water happens to be present during the period of construction, temporary coffer dams will be used to redirect any surface water flows around the construction work area with any water from the interior of the coffer dam area discharged through a filter bag or straw bale siltation basin located in uplands.
2. Equipment working in streams will work from wood or steel mats to minimize soil disturbance.
3. Post-construction temporarily filled areas will be restored to original ground surface elevation with fill material off hauled and disposed of at a suitable upland location.
4. To prevent erosion and sediment transport Cori (coconut), jute, or sterile straw erosion control blankets and logs, and/ or loose sterile straw, will be used as appropriate following seed bed preparation of bare soil areas.
5. Project will not use erosion control materials containing plastic monofilament netting (erosion control matting) or similar material containing netting within the Project area due to documented evidence of birds, amphibians, and reptiles becoming entangled or trapped in such material. Acceptable substitutes include erosion materials contained with burlap netting, burlap tubes filled with natural fiber material, rolls of coconut coir matting or similar.
6. Hydroseeding will follow the installation of natural fiber matting, rolls, and/or loose straw BMPs.
7. Hydroseed mix will include native grass seed that produce dense fibrous rootsystem, organic mulch, slow-release fertilizer, mycorrhiza, and organic tackifier.

Mitigation Monitoring BIO-11:

Prior to any ground disturbance(s), the Project Review Division shall ensure that protection measures 1 – 7 are listed on building, and grading permits. Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above notes are printed on all construction plans including plans for building and grading.



From: Hansen, James@Wildlife <James.Hansen@Wildlife.ca.gov>

Sent: Tuesday, July 30, 2024 11:44 AM

To: Joshua Miranda <Joshua.Miranda@sonoma-county.org>

Subject: Villa Vanto Farm MND Comment

EXTERNAL

Hi Joshua,

I have reviewed the MND for this project and have a quick request. Can you please add in a Bio mitigation measure requiring the project proponent apply for, and if necessary, obtain an LSA Agreement from CDFW? The project includes construction of a new bridge which will require Notification to the 1600 program.

I do not have other comments or really time to write a formal letter. Can you accept this request via email?

Please let me know if you have any questions.

Thank you,
James

James Hansen
Environmental Scientist
Habitat Conservation Program – Sonoma County
California Department of Fish and Wildlife
Bay Delta Region
James.Hansen@Wildlife.ca.gov

***I am currently working remotely and can be reached most effectively via email.**



“The Mission of the Department of Fish and Wildlife is to manage California's diverse fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public.”

-
CDFW is transitioning to the Environmental Permit Information Management System (EPIMS), an online system, for all Lake or Streambed Alteration (LSA) Notifications. **CDFW now *only* accepts standard and emergency Notifications through EPIMS.** For more information visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

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Ronald LaVigna

1272 San Antonio Road • Petaluma, CA 94952 • Phone: 707.338.0558
E-Mail: drrolav@gmail.com



Date: August 1, 2024

Hannah Spencer
Supervising Planner
Hannah.Spencer@sonoma-county.org

Joshua Miranda
Project Planner
Joshua.Miranda@sonoma-county.org

County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

This submission is in response to request for comments on a "Notice of Intent to Adopt a Mitigated Negative Declaration Pursuant to the CEQA", Permit Sonoma File #PLP24-0012. The subject property is located at 4485 D Street Extension, Petaluma.

Attention Hannah Spencer & Joshua Miranda:

I am thoroughly against Permit Sonoma adopting a Mitigated Negative Declaration ("MNP") in regard to Permit Sonoma File #PLP24-0012.

It is well document that the Villa Vanto Event Center (Vero-West.com) was built fraudulently. The owners have flaunted their fraudulent building on Social Media, therefore making a mockery of our zoning and building departments. For Permit Sonoma to even consider to recommend adoption of a MNP implies that Permit Sonoma is complicit to this fraudulent activity committed by the owners of Villa Vanto located at 4485 D Street Extension in Petaluma.

The zoning restrictions placed on the property located at 4485 D Street Extension, Petaluma, run with the land. Under normal course, the owners were aware of the property zoning when they made their purchase. They were also aware of the zoning when they built an event center with an Ag building permit etc,etc. This was a circumvention of the normal process because the zoning does not allow event centers on that parcel. Sonoma County is experiencing a rash of others trying to circumvent land use zoning. This Back Door effort through the Board of Zoning and Adjustments makes a mockery of our zoning and permitting process and certainly questions the accountability of Permit Sonoma among others. Do you really want to open the barn doors to this type of activity in this manner?

It is not the responsibility of landowners to be good stewards of their own property and also be policing the zoning and building regulations of their neighbor's land.



Permit Sonoma has no basis to recommend a MNP. The Board of Zoning adjustments has no basis for making a zoning adjustment in this case.

Sincerely,

Ronald M. LaVigna

cc:

David Rabbitt

Pat Gilardi

Larry Reed

Tennis Wick

Tyra Harrington

From: [Jeff Daniel](#)
To: [Joshua Miranda](#); [Hannah Spencer](#)
Cc: David.Rabbitt@somoma-county.org; [Pat Gilardi](#); [Larry Reed](#); [Tennis Wick](#); [Tyra Harrington](#)
Subject: 4485 D Street Negative Declaration
Date: Monday, August 05, 2024 12:10:51 AM

EXTERNAL

This submission is in response to request for comments on a "Notice of Intent to Adopt a Mitigated Negative Declaration Pursuant to the CEQA", Permit Sonoma File # PLP24-0012. The subject property is located at 4485 D Street Extension, Petaluma.

Dear Hannah and Joshua,

An events center drawing customers for non-agricultural events is not what the Williamson Act had in mind. A farmers market or educational center open to the public maybe, but not an exclusive party venue that would be closed to anyone genuinely interested in agriculture.

If the Ghilottis want the Williamson Act repealed let them get that done first. There shouldn't be an exception for this landowner that would not be made available to us all. What I find the most objectionable is that if it was any of the neighbors asking for a negative declaration I don't think we'd have any chance at all. A negative declaration is something only the wealthy and influential can use to break a covenant that doesn't serve them. We certainly couldn't count on the Ghilotti's support should we ever try.

The local families out here have supported the Williamson restrictions because we genuinely believe in them. The Ghilottis have benefited from what looks like a bad-faith use of Williamson tax breaks for decades. They pocketed the tax benefits and now want additional non-agricultural income. Making exceptions for wealthy families when multi-generational landowners get stiffed is just wrong! Allowing them to benefit by having wedding parties zoom past the 'quaint old farmhouses' with struggling farmers, so their brand-new steel venue feels more authentic, just adds injury to the injustice.

Also please consider who will actually bear the burden of compliance monitoring. We are the ones who will be kept up until we are forced to call the Sheriff. We will have to organize to track the abuse of after-hours noise. We will have to track their activities to ensure there are only 28 'events' of the approved types. How would we even do that? When those parties do let out I fear for anyone driving on San Antonio Rd with alcohol in their system. I hope to God none of us are coming the other way. Finally, if they or their guests are a nuisance to the community, who will have to take the time and pay the costs of trying to get them to comply or get their permit revoked? Our community only stands to lose, and the only people who will benefit are the Ghilottis. Please consider equity and fairness in your decision.

Your support on this matter is very much appreciated.

-Jeff Daniel
San Antonio Rd.

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From: [Nancy Feehan](#)
To: [David Rabbitt](#); Tennis.Wick@sonoma-county.org; Tyra.Harrington@sonoma-county.org; [Hannah Spencer](#); [Joshua Miranda](#)
Subject: Re: [socomoag:4795] Event Center in LEA Ag Zoning: Sign On or submit a letter re: UPE21-0064
Date: Sunday, August 04, 2024 8:02:26 PM

EXTERNAL

On Aug 4, 2024, at 7:42 PM, Rue <rmf@sonic.net> wrote:

David Rabbitt
Supervisor
Sonoma County, District 2
David.Rabbitt@sonoma-county.org

Tennis Wick
Permit Sonoma Director
Tennis.Wick@sonoma-county.org

Tyra Harrington
Code Enforcement Manager
Tyra.Harrington@sonoma-county.org

Hannah Spencer
Supervising Planner
Hannah.Spencer@sonoma-county.org

Joshua Miranda
Project Planner
Joshua.Miranda@sonoma-county.org

RE: Permit Application UPE21-0064 and BLD21-8704, Permit Sonoma File # PLP24-0012

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

I write to oppose the granting of Use Permit UPE21-0064.

Approving this use permit would set a troublesome precedent encouraging other landowners to ignore County and State rules, and to exploit agricultural exemptions for non-agricultural commercial purposes. This would effectively sabotage the State and County voter-approved General Plan, applicable land use zoning restrictions, and the Williamson Act.

In April 2021, the applicants took out a permit to construct a 5000 square foot AG exempt barn to store “hay, feed and farm machinery.” Instead, they proceeded to build a finished event center (with a bridal suite, men’s and women’s restrooms, and multi-story windows) to host their wedding and to rent for weddings and events in the future. In addition to high-end finishes, they landscaped the building with heritage non-fruiting olive trees, roses, and astroturf to create outdoor gathering spaces.

The applicants now represent 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.

Use permit UPE21-0064 requests permission to hold Periodic Special Events in the event center. Among the proposed uses are 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.

The scale, frequency, and primary purpose of the proposed events fail to meet the criteria for permitted uses in LEA zones. The application describes events as a "key part of the farm's business plan." There is no doubt about that: events *are* the business plan. In fact, based on the scale of the project, the number of events, and potential attendees (up to 4,000 annually), the State Water Resources Control Board has determined that a new public water system may be created by the project.

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, I respectfully request you that deny this use permit application. This outcome will support adherence to County and State laws, and the farmers and ranchers who comply with them.

Sincerely,
Nancy Feehan
30090 Seaview Road
Cazadero, CA 95421

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From: [tom gawronski \(via Google Docs\)](#)
To: [Joshua Miranda](#)
Cc: [David Rabbitt](#); [Tennis Wick](#); [Tyra Harrington](#); [emailanned@gmail.com](#)
Subject: 4485 D Street Extension Response 7-20-24
Date: Monday, July 22, 2024 11:45:06 AM

EXTERNAL

tom gawronski attached a document



tom gawronski (54tomgawronski@gmail.com) has attached the following document:

Dear Permit Sonoma-

Please find attached our letter concerning the proposed project at 4485 D Street Extension, Petaluma. We would appreciate your consideration of the concerns stated therein.

I would appreciate it if Permit Sonoma would please confirm receipt of this letter.

tom gawronski /anne dechelbor



4485 D Street Extension Response 7-20-24

Snapshot of the item below:

July 20, 2024

TO: Mr. David Rabbit - County Supervisor
Mr. Tennis Wick - Permit Sonoma Director
Ms. Tyra Harrington - Code Enforcement Manager
Mr. Joshua Miranda - Project Planner
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Permit Sonoma,

This letter is in response to request for comments on a "Notice of Intent to Adopt a Mitigated Negative Declaration Pursuant to the CEQA", Permit Sonoma File # PLP24-0012. The subject property is located at 4485 D Street Extension, Petaluma.

We are owners of property immediately adjacent to the subject property and wish to state our objections and concerns related to the proposed project. The applicants proposal represents an event center in need of a justification. The property was subject to the conditions of the Williamson Act at the time it was purchased by the applicants. Despite having full knowledge of the restrictions encumbered by the Williamson Act, the applicants, in 2021, proceeded to construct a substantial 5,020 sf building and environs and advertise it online as a wedding venue. Construction of the "Ag Exempt Building" was defined in the permit application and associated affidavit as used for "storage of hay, grain and farm equipment". In clear violation of the Williamson Act restrictions prohibiting non-agricultural activities, the 2021 construction work generated ardent objections from local San Antonio Valley residents. Concerns from neighbors were raised and submitted to the County for consideration. Simply put, our current objections are the same as stated in September 3, 2021 and August 9, 2021 letters to the County by Protect San Antonio Valley (PSAV).

Now, three years later, a new proposal surfaces. And why not.....the applicants have an empty, unused two story, 5,020 sf event center with high end finishes, three restrooms, lavish landscaping and extensive hardscape they must find a use for. They now speak of lavender, 28 yearly events with amplified music, farm-to-table events, and parking for 160 cars. Who builds a 5,000 sf building with extensive landscaping, hardscape and parking for lavender production? **However, Villa Vanto continues to maintain a website heralding its wedding event services (irelyeaevents.com/villavanto).** Nothing has changed, it's still an event center, constructed in violation of the Williamson Act, trying to find a purpose.

Our concerns with the proposal include:

1. **AG EXEMPT STATUS:** In April, 2021, the "new" event center was apparently awarded an agricultural exemption. However, we believe Ag Exemptions (per Sonoma County Policy and Procedure - Number 7-0-2) explicitly state that such buildings cannot contain:
 1. waste systems
 2. installation of sinks, tubs, showers or any other fixture requiring connection to waste or sanitary piping
 3. hot water piping or water heaters
 4. cannot be used for human habitation or USED BY THE PUBLIC (Section 202 CBC)
 5. residential wall furnaces, forced air systems, residential heat exchangers and associated ducting
 6. outlet boxes not serving a specific authorized use, such as a

- dedicated piece of equipment or work bench
7. installation of insulation to support a proposed future change of occupancy

How the applicants were allowed to construct such a structure in clear conflict with Ag Exempt permitted conditions and obtain County approvals is beyond questionable. Certainly, County inspections occurred during construction yet the Ag Exempt violations were seemingly overlooked.

We have not accessed the building's interior but given that it contains two restrooms and an "owners" upstairs restroom, and was built as an event center, likely with sinks, hot water, heating and insulation, and more than a few outlets, we question how it was granted Ag Exempt status. This, in no way, aligns with the intended use for "storage of hay, grain and farm equipment" stated in the original permit application.

1. From our property, we do not see any new lavender or olive trees (other than those planted with the event center in 2021) planted anywhere. Lavender typically becomes a viable, producing cash crop approximately three years after planting. How does one offer "agricultural" events without a product?
1. **PARKING:** Obviously, we have concerns with approximately 150 cars being parked on "mowed grasses". All it takes is a careless cigarette or a hot catalytic converter to create a fire, and the nearest emergency responders are in downtown Petaluma.
1. **EVENTS:** In their "Summary of Retail and Sales", the applicants admit that their business model relies significantly on "events" for its success. The additional events they propose, such as farm-to-table dinners, are a poor attempt to justify the agricultural element required by the conditions of the Williamson Act given that a majority of products consumed will come from off-site, not originating from onsite. In no way do wedding events, currently advertised online thru Villa Vanto, meet the conditions of the Williamson Act.

Twenty eight events a year for lavender sales? Who are we fooling? Will they have multiple events a week during the prime spring/summer months of lavender as attendance/interest will surely diminish during the winter months? Multiple events a month would create an untenable environment for adjacent landowners who have chosen a rural environment for its quiet, natural beauty.

We also believe their attendance numbers are significantly inflated in an attempt to justify the number of events. How many non-agricultural weddings/events will occur under the guise of a lavender or farm-to-table events? What processes exist for the County to monitor such activities and how are violations addressed and enforced? There already exists a long, well documented history of misrepresentation from the applicants.

1. **NOISE:** Amplified event music up to 10pm is a concern, whether

it's indoors or not. During warm spring/summer weather, doors and windows of the event center will certainly be open, allowing unwanted noise pollution. Adding alcoholic beverages, described online as being available at proposed events, only adds potential disruption to the existing rural atmosphere. The entire operation is located in a natural amphitheater meaning sound easily travels to adjacent lands. Event music should be strictly limited and ENFORCED to protect neighboring properties and area wildlife. How would the County enforce such regulations?

1. **LIGHT POLLUTION:** Increased evening and night events increase light pollution in a rural environment disrupting adjacent neighbors and nocturnal wildlife. Traffic leaving the site at 10pm offers not only increased and unnecessary light pollution, but noise from automobiles and trucks, vehicle music, and horns.
1. **ACCESS ROADS:** The proposal shows a road on the west side of the property cut thru the "existing native oak forest" to a location immediately adjacent to our property. This area is by far, the steepest land on the property (probably in excess of 50 degree slope) and cutting a road involves significant grading and drainage work. Our concerns include impacts to the existing legacy oaks (a stand of mature trees, hardly the "oak forest" advertised), whether the road is paved or not, and the potential landslide issues created by road cuts and drainage. Granted, Ghilotti can and will construct a road anywhere but at what cost to the landscape? and for what reason? This road will significantly scar the natural hillside and put our property at risk of future landslides.

We strongly urge the County to walk the applicant's property to fully understand the geography at risk.

1. **SONOMA COUNTY'S LEA DISTRICT (Ord.5584):** Section 26-06-010 paragraph (m) prohibits bed and breakfast inns from having weddings, lawn parties or similar activities. Would this not apply to this project's intended use?

We submit these concerns to the County Planning and ask that you consider the impacts to the residents who moved to this area for the rural environment it offers. Our objections are not with lavender, but lie with the impacts of monthly events continuing well into the night, potential fire danger, increased noise, light and vehicle traffic and potential landslide issues. It is imperative that the rural agricultural nature of San Antonio Valley be maintained. We don't need an event center operating under the guise of a lavender farm.

Sincerely,

Tom Gawronski

Anne DeChelbor

2000 Longhorn Lane
Petaluma, CA 94952
415 847-3375

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043,
USA

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From: [Michael Mayo](#)
To: [Joshua Miranda](#); [Hannah Spencer](#)
Cc: [David Rabbitt](#); [Pat Gilardi](#); [Larry Reed](#); [Tennis Wick](#); [Tyra Harrington](#); [Michael Mayo](#)
Subject: Objection to Proposed Development Under the Williamson Act @ Villa Vanto Event Center: Background and Objections Permit Application UPE21-0064 and BLD21-8704 Permit Sonoma File # PLP24-0012
Date: Monday, August 05, 2024 12:30:23 PM

EXTERNAL

Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA. 95403
Mr. Joshua Miranda – Project Planner
Ms. Hannah Spencer – Supervising Planner

cc: Mr. David Rabbitt – Board of Supervisors/Sonoma County
cc: Mr. Pat Gilardi – Commissioner
cc: Mr. Larry Reed - Commissioner
cc: Mr. Tennis Wick – Permit Sonoma Director
cc: Ms. Tyra Harrington – Code Enforcement Manager

Subject: Objection to Proposed Development Under the Williamson Act @ **Villa Vanto Event Center**,
Permit Application UPE21-0064 and **BLD21-8704**
Permit Sonoma File # PLP24-0012

Dear Permit Sonoma,

I am writing to formally object to the proposed development on the property currently under the Williamson Act, located proximate to my residence. This proposal, which seeks to transform the land into a venue for wedding and various commercial events, poses significant legal, environmental, and community concerns. As a stakeholder in the preservation of our rural environment, I believe that the proposed activities contravene the fundamental principles of the Williamson Act and threaten the tranquility and ecological integrity of our San Antonio valley.

Our objections are detailed as follows:

1. ****Agricultural Viability:****

Upon inspection from our property, there is a noticeable absence of new lavender or olive plantings, save for those established adjacent to the barn in 2021. Given that lavender requires a minimum of three years to mature into a productive cash crop, the current state of the property raises substantial doubts about the feasibility of hosting legitimate “agricultural” events. The absence of a viable agricultural product undermines the foundation of the proposed activities.

2. ****Parking and Fire Risk:****

The proposal to accommodate approximately 150 vehicles on mowed grasses presents an unacceptable fire hazard. Last year this property was affected by a fire where 3 planes, 1 helicopter, 10 fire trucks and 30 firefighters butler this fire, avoid g the spread to our houses. The risk of ignition from a careless cigarette or a hot catalytic converter is compounded by the extended emergency response time, which is at least 10-15 minutes in our rural locale. This plan poses a serious threat to public safety and contravenes prudent land management practices.

3. ****Nature and Frequency of Events:****

The business model outlined in the “Summary of Retail and Sales” relies heavily on events, many of which are not inherently agricultural in nature. Events such as farm-to-table dinners will predominantly use products sourced off-site, thereby failing to meet the stringent agricultural requirements stipulated by the Williamson Act. Furthermore, wedding events currently promoted by Villa Vanto on their website do not align with the Act’s conditions. The proposed frequency of 28 events per year will create significant disruption to neighboring landowners, who value the rural environment for its peace and natural beauty. The projected attendance figures appear inflated and warrant thorough scrutiny. We seek clarification on the county’s mechanisms for monitoring and enforcing compliance to prevent non-conforming events.

4. ****Noise Pollution:****

The allowance for amplified music until 10pm is highly problematic given the natural amphitheater topography of the area, which amplifies sound. This will adversely affect the quiet enjoyment of neighboring properties and disturb local pressure wildlife. The noise pollution during the construction was carried on by the typography, additional noise from proposed events is untenable.

5. ****Environmental Impact of Access Roads:****

The proposal includes constructing a road on the west side of the property, cutting through an existing native oak forest adjacent to my property. This area, characterized by steep slopes exceeding 50 degrees, necessitates extensive grading and drainage work. Such construction poses significant risks, including potential landslides and irreversible damage to legacy oaks. The environmental impact of this road is profound and incompatible with sustainable land stewardship.

In conclusion, the proposed development is fundamentally incompatible with the Williamson Act's objectives and poses serious risks to our community's safety, environmental integrity, and quality of life. I respectfully urge the Sonoma Land Protection Agency to deny this proposal in order to protect the rural character and natural beauty of our region.

Thank you for your attention to this matter.

Sincerely,

Michael Mayo
1000 Longhorn Lane
Petaluma, CA. 94952
mmayo94110@yahoo.com
415-244-1927

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From: [Mary Plimpton](#)
To: [David Rabbitt](#); [Tennis Wick](#); [Tyra Harrington](#); [Hannah Spencer](#); [Joshua Miranda](#)
Subject: Permit Application UPE-0064
Date: Monday, August 05, 2024 2:20:39 PM

EXTERNAL

We write to oppose granting Use Permit UPE21-0064.

We object to the precedent that such an approval would set, effectively opening the door to any rural community becoming commercial zone through means of exploiting agricultural exemptions for non-agricultural commercial activities.

We object to the approval of an application so blatantly dishonest as to assert that a graciously landscaped luxury structure with bridal dressing suite is primarily just an agricultural barn for use in drying lavender said to be grown on the property, and for the promotion lavender products.

This deliberately misleading application smacks of the cynical -“Better to ask forgiveness than to ask permission” – and reflects poorly on the Ghilotti name and on their businesses.

That the Ghilottis are important contractors with the county doesn't reflect well on the county either.

Friends of Franz Valley

(Mary Plimpton
8425 Franz Valley School Road)

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From: [Padi Selwyn](#)
To: [David Rabbitt](#); [Tennis Wick](#); [Tyra Harrington](#); [Hannah Spencer](#); [Joshua Miranda](#)
Subject: RE: Permit Application UPE21-0064 and BLD21-8704, Permit Sonoma File # PLP24-0012
Date: Monday, August 05, 2024 10:51:13 AM

EXTERNAL



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

Preserve Rural Sonoma County strongly opposes the granting of Use Permit UPE21-0064 and requests that this permit application be denied.

This property owner has flagrantly ignored County and State rules to exploit agricultural exemptions for non-agricultural commercial purposes. Issuing this permit would send a "we're looking the other way" message to other landowners, while setting a worrisome precedent, encouraging others to ignore LEA zoning and give tacit permission to breach the Williamson Act, which was intended to preserve agricultural land and provide tax benefits to active farmers and ranchers – not commercial developers.

Despite the fact that in April 2021, the applicants took out a permit to build a 5,000 square foot AG exempt barn to store "hay, feed and farm machinery," they then proceeded to construct an event center to rent for weddings and other events.

The applicant asserts that the event center building will be used for agricultural purposes: to dry, process and sell lavender grown on their "lavender farm," and to store equipment. Curiously, there is no sign of any lavender planted on the property -- just a bridal suite, and astroturf outdoor spaces, perfect for outdoor events. There appears to be no agricultural activity whatsoever.

Permit # UPE21-0064 requests permission to hold Periodic Special Events in the event center; including 28 events annually --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. It is clear that the primary purpose of this project is to host events, not to promote lavender.

It is obvious that the scale, frequency, and primary purpose of the applicant's proposed events do not meet the criteria for permitted uses in LEA zones. Events are

described as a "key part of the farm's business plan " There is no doubt about that: events *are* the business plan.

We ask that you please deny this Use Permit and support those ranchers and farmers who do comply with County and State laws.

Sincerely,

Padi Selwyn, Co-chair
(707) 569-6876

Co, chair, PRESERVE RURAL SONOMA COUNTY
Secretary, SONOMA COUNTY TOMORROW, INC.

Visit PRSC'S website at - <http://www.preserveruralsonomacounty.org>

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From: [Elizabeth Carpenter](#)
To: [Hannah Spencer](#); [Joshua Miranda](#)
Cc: [David Rabbitt](#); [Pat Gilardi](#); [Larry Reed](#); [Tennis Wick](#); Trya.Harrington@sonoma-county.org
Subject: Permit Sonoma File # PLP24-0012
Date: Sunday, July 28, 2024 4:14:04 PM

EXTERNAL

This submission is in response to request for comments on a “Notice of Intent to Adopt a Mitigated Negative Declaration Pursuant to the CEQA”, Permit Sonoma File # PLP24-0012. The subject property is located at 4485 D Street Extension, Petaluma

Objections

1. Zoning Non-Compliance: The proposed uses (aside from growing and selling lavender) do not comply with the Land Extensive Agriculture (LEA) zoning under the Sonoma County General Plan. The planned events are neither agricultural promotional events nor secondary or incidental to agriculture as required by the zoning regulations. In what world is a wedding or corporate gathering primarily an “agricultural promotional event”?
2. Scale and Purpose: The scale, frequency, and primary purpose of the proposed events fail to meet the criteria for permitted uses in LEA zones. The application describes events as a "key part of the farm's business plan." According to their own social media accounts and advertising, applicants custom-designed and built a luxury Event Center. and the construction plans now on file appear to show that only a small fraction of the building would be dedicated to lavender distillation, storage and sales. The applicants now claim that 3,575 square feet will be a “lavender processing” facility, but that label does not un-do the reality of the purely non-agricultural building they built, or its purpose as an Event Center.
3. Misuse of "Temporary Event" Classification: The proposed use is permanent, not temporary, contradicting the intent of "Temporary Events" as defined in the Sonoma County Code of Ordinances.
4. Permanent Land Use Change: If approved, the use permit would "run with the land," potentially altering the rural character of the area permanently by allowing operation of a dedicated luxury Event Center with weddings and other large non-agriculture events held every weekend of the dry season.
5. Williamson Act Violation: This property has been under a Williamson Act

contract since 2002. The building's large size and primary use as an Event Center would constitute a material breach of the Williamson Act, which is intended to preserve agricultural land and provide tax benefits to active farmers and ranchers. Developers should not be allowed to exploit agricultural tax advantages and protections for non-agricultural commercial gain.

6. Inconsistent Representations: There are significant discrepancies between the promotional materials recently distributed to neighbors and the actual use permit application, particularly regarding the scale of lavender cultivation (10 acres versus 2 acres) and the nature of proposed events (25 “immersive lavender experiences” versus 28 weddings, corporate events, and fundraisers).

7. Developer Background: The applicants' corporate website, [Vero-West.com](#), describes their strategy as developers, and features photos of the Event Center's construction. The website expresses a focus on leveraging local economic protections for long-term cash flow, including through “improvements and leasing,” and makes no mention of agriculture or lavender farming.

8. Enforcement Concerns: Given the applicants' documented history of violating county restrictions, there are concerns about compliance and enforceability of any imposed limitations on any use permit if granted.

9. Precedent Setting: Approving this use permit could set a problematic precedent, potentially encouraging other landowners to ignore County and State rules, as well as exploit agricultural exemptions for commercial purposes.

Yours sincerely
Elizabeth Carpenter
Mark Carpenter
1205 San Antonio Rd
Petaluma ca

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Kathleen Lavigna
1250 San Antonio Rd
Petaluma CA 94952

Mario Ghilotti
4485 D St Extension
Petaluma
Re: Villa Vanta Use Permit (UPE21-0064)

I have recently received your brochure promoting the Event Center at your property at 4485 D St Petaluma. I am still opposed at this attempt to change the character and zoning of this area to accommodate your Event Center.

You proceeded with construction and grading without having the proper permitting in place and violated many permits after signing a certificate under penalty of perjury. Your property is enrolled in the Williamson Act to protect your ranch from excessive taxes, yet, as you keep the tax benefits, you constantly violate the rules associated with the provisions of this law.

Everyone in this area was and is acutely aware of the zoning in our community. That is why we are all here. We have all invested in our properties, our homes and our futures here because we want an agricultural landscape not a public event endeavor. To try and change that for your personal profit and gain is objectionable to all who live here.

You were told before you began this project, by County officials, that this project was not legal for your zoning. I request to be notified as is required of any changes happening.

No one in the community would object to a working lavender farm. A use permit is not required. To create an Event Center under the guise of a lavender farm is not acceptable.

Sincerely
Kathleen Lavigna