



ATASCADERO / GREEN VALLEY WATERSHED COUNCIL
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To: Sonoma County Board of Zoning Adjustments
Melinda Grosch, Planner, Sonoma County PRMD

From: Atascadero / Green Valley Watershed Council (AGVWC)
Date: January 21, 2010

Subject: Crossbarn Winery, 4930 Gravenstein Highway North, Sebastopol, Sonoma
County. Application PLP08-0073

The Atascadero / Green Valley Watershed Council is dedicated to taking responsibility for our watershed through protection, restoration and education. Because of our mission AGVWC is submitting the following comments on the proposed new winery and tasting room, Crossbarn Winery at 4930 Gravenstein Highway North, Sebastopol. Our comments are as follows:

1) New site structures and a "process and sanitary subsurface drip dispersal systems" are shown on site plan maps located in the southeast corner of the 7.45 acre parcel. This location is only about 40 feet from the fence line to the adjacent parcel to the south (Lands of Holcomb). The Holcomb property contains wetland and riparian areas of Pitkin Creek and Pitkin Marsh. (These wetlands and riparian areas are co-joined with lower Pitkin Marsh under the Hwy 116 overpass.)

AGVWC is concerned with the placement of impervious pavement, structures and an onsite commercial waste and septic system on a slope which drains directly to the wetlands and riparian areas of Pitkin Creek. Although a wetland delineation and biological assessment was conducted for the Hobbs property, no assessments were conducted on the adjacent Holcomb property. Since, to our knowledge, there has been no work to identify the potential for rare plants or to delineate wetlands on the Holcomb property to the south, Sonoma County PRMD does not have the evidence it needs to determine that the septic system is sited 100 feet from wetlands or surface seeps (springs) as required in the county septic permit process and the Water Quality Control Board Basin Plan. Also, because of the sensitive nature of Pitkin Creek wetlands and the potential for rare plant species to exist downgradient of the lower Pitkin Marsh, a greater than 100 feet setback from the uphill septic system to wetlands of Pitkin Creek should be considered.

AGVWC recommends that to properly site the septic system 100 feet from wetlands or surface seeps, a wetland delineation should be performed on the adjacent parcel to the south. If this is not possible, the winery project should be redesigned to locate the proposed features, including the septic, away from the south end of the property, possibly north of the existing residence in the septic expansion area.

2) The existing septic system is not shown on the site map.

3) Pitkin Creek flows into Atascadero Creek, Green Valley Creek and finally the Russian River. Atascadero and Green Valley Creeks are identified as important Coho and salmon habitat streams and much effort has been expended to try to recover these species along these creeks. However, as has been said, the fish are literally dying a "death by a thousand cuts" and this project may be one more cut.

According to the declaration, a "properly installed septic system will not result in wastewater being discharged into the environment." However, since the septic system is on a downward slope toward Pitkin Creek, it is hard to imagine that the waste stream would not someday enter the creek and add another negative water quality impact to the fish trying to survive in the Atascadero/Green Valley system.

There is no mention in the mitigated negative declaration regarding hydrology, water quality, or cumulative impacts about the potential for further degradation of Coho and salmon habitat due to changes in the drainage, hydrology and water quality from this winery project. This issue should have been addressed in the neg dec.

There is also no analysis of the impact on creek water flow secondary to dramatically increased groundwater use

4) To prevent runoff of storm water, surface soils and sediment to Pitkin Creek, PRMD recommends a mitigation measure to "install vegetated swales, detention basins, and other forms of storm water management" "along the edges of the vineyard as well as in areas around the winery and tasting room." The storm water features are not shown on a site map. Melinda Grosch has stated that the storm water management features would be designed and incorporated after project approval. How can the public evaluate the placement and adequacy of storm water features if they are not included in the project design? These features need to be incorporated in the site map available for public review prior to public review and public hearing.

Additionally, with the location of structures (including a trash receptacle) within 20 feet of the south property line, there does not appear to be enough room for the installation of storm water swales or catchment basins between the proposed structures and the south fence line.

5) We see no mention in the declaration of the possible impacts of the proposed widening of Highway 116 on the protected wetlands that the highway crosses. We are also concerned about the safety of the winery entrance on this dangerous stretch of highway 116.

6) Potential alternative locations for the winery should be evaluated as part of the mitigated neg dec. We are aware the Mr. Hobbs owns additional vineyards within the area, including other vineyards near and on Hwy 116. Would the construction of a winery on any of these alternative locations be feasible and result in less potential impacts to wetlands and creeks than the proposed location? We believe this question should be asked by PRMD and the Board of Supervisors to determine if a more suitable winery location with less potential environmental impacts could be found.

In summary, it is the opinion of the AGVWC, that the mitigated negative declaration does not suffice to answer the numerous environmental questions raised by the proposed project, especially to the nearby extremely sensitive and important wetlands. We strongly urge a wetland delineation on adjacent properties and believe that an Environmental Impact Report for the proposed project is essential.

Thank you for allowing these comments.

For the Atascadero / Green Valley Watershed Council,

Dr Zeno G Swijtink
President