

**COMMENTS BEFORE
NAPA COUNTY PLANNING COMMISSION
RE: RAYMOND WINERY APPLICATION**

JULY 16, 2014

I AM A RAYMOND WINERY NEIGHBOR AT 525 ZINFANDEL LANE AND A GRAPE GROWER.

AS GRAPE GROWERS WE ARE DEEPLY CONCERNED ABOUT GRAPE SOURCING & COMPLIANCE WITH WDO 75% RULE. WHILE MORE NEEDS TO BE DONE THE CASTELLUCCI WINERY PROPOSAL SET A NEW STANDARD FOR COMPLIANCE. PLANNING STAFF SEEMS TO NOW UNDERSTAND OUR CONCERNS, BUT STAFF NEEDS TO EITHER DEVELOP A DETAILED MAP SHOWING WHERE ANY ADDITIONAL NAPA GRAPES ARE GOING TO BE GROWN OR ADMIT THAT THERE ARE NO NAPA VALLEY GRAPES AVAILABLE FOR NON-VINEYARD OWNING NEW WINERIES OR LARGE EXPANSION.

THE RAYMOND WINERY HAS REMOVED ANY PRODUCTION INCREASE FROM THIS PROPOSAL. THAT MOVE PLACES THEIR HOSPITALITY ACTIVITIES EVEN MORE OUT OF BALANCE WITH THEIR PRODUCTION ACTIVITY. ANCILLARY HOSPITALITY ACTIVITIES AT RAYMOND ARE NOW SO GREAT AS MUST BE CONSIDERED "COMMERCIAL" ACTIVITY PROHIBITED BY THE WDO.

WE ARE CONCERNED ABOUT GRAPE ISSUES BUT A MAJOR CONCERN IS ENVIRONMENTAL; TRAFFIC, NOISE, CONGESTION. OUR NEIGHBORHOOD IS

BECOMING AN INDUSTRIAL ZONE. WHILE SOMEWHAT REDUCED, THE NEW AND EXPANDED ACTIVITIES THAT THIS REQUEST INCLUDES ARE STILL MASSIVE INCREASES TO ALREADY SIGNIFICANT HOSPITALITY ACTIVITY. THE STAFF'S RECOMMENDATION OF A NEGATIVE DECLARATION ON THIS PROJECT IS INAPPROPRIATE DUE TO CUMULATIVE ENVIRONMENTAL EFFECTS' CONSIDERATIONS.

AS KATE'S MAP SHOWS, THERE ARE ALREADY OVER 10 WINERIES LOCATED ON OR BETWEEN RT. 29 AND SILVERADO TRAIL ON ZINFANDEL AND GALLERON LANE. IT FURTHER SHOWS THAT OVER 20 ADDITIONAL PARCELS OF 10 OR MORE ACRES ARE LOCATED IN THAT SAME AREA. UNDER CURRENT COUNTY ATTITUDES ALL OF THOSE PARCELS ARE SERIOUS WINERY CANDIDATES. THE CUMULATIVE ENVIRONMENTAL EFFECTS ARE DEVASTATING.

THIS IS NOT JUST A GROWER/WINERY CONCERN ANYMORE. NO ONE IN ST. HELENA WOULD DISAGREE THAT THE TRAFFIC SITUATION IN THE UPPER VALLEY IS A REAL PROBLEM OR THAT EXPANSIVE WINERY HOSPITALITY ATTRACTIONS ARE A MAJOR CULPRIT. EXCESS TRAFFIC, NOISE AND CONGESTION IS ENVIRONMENTAL DAMAGE.

ALL IN THE COMMUNITY SHOULD NOT BE REQUIRED TO SUFFER THE ENVIRONMENTAL DAMAGES NEEDED TO BENEFIT THE BUSINESS OF A FEW.

THE AG PRESERVE IS NOT JUST A COUNTY ORDINANCE. IT'S THE SECRET TO OUR ECONOMIC SUCCESS - IT'S WHAT MAKES NAPA SPECIAL. THE WDO IS A MAJOR, IF NOT THE, COMPONENT OF OUR AG PRESERVE. THE AG PRESERVE AND ACCEPTANCE OF THE WDO RESTRICTIONS IS GOOD BUSINESS. THAT WAS TRUE IN 1970, 1980, 1990, 2000 AND NOW. IN EVERY PERIOD THERE HAVE BEEN A FEW WHO DIDN'T ACCEPT THE RESTRICTIONS DUE TO A CURRENT FAD. BUT THE RESTRICTIONS HAVE HELD AND BUSINESS (GROWER & WINERY) HAVE BEEN SUCCESSFUL, VERY SUCCESSFUL, WHILE ACCEPTING THE RESTRICTIONS AND COMPLYING.

THIS RAYMOND PROJECT IS NOT GOOD FOR THE COMMUNITY. IT VIOLATES THE INTENT AND THE LETTER OF THE WDO AS IT SEEKS TO CIRCUMVENT THE RESTRICTIONS IN THE NAME OF THE MOST CURRENT FAD, DIRECT TO CONSUMER SALES.

NOT MANY YEARS AGO, THE VINTNERS DECIDED THAT THEY DIDN'T WANT ALL THE PEOPLE VISITING THEIR WINERIES SO THEY BEGAN TO CHARGE FOR THE TASTINGS. THEY ONLY WANTED THE "RIGHT" VISITORS: THOSE WHO BOUGHT WINES. HOW LONG WILL IT BE BEFORE THEY DECIDE AGAIN THAT THE COST AND BOTHER OF ENTERTAINING ALL THE CONSUMERS DIRECTLY AT THE WINERY ISN'T WORTH THE EFFORT? LET'S NOT THROW THE AG PRESERVE AND OUR ENVIRONMENT UNDER THE BUS AS WE AWAIT THAT DECISION.

THE ENVIRONMENTAL REVIEW (EIR) DONE IN 1989 AS PART OF THE ORIGINAL WDO WAS WOEFULLY SHORTSIGHTED AND TERRIBLY INADEQUATE FOR TODAY'S CONDITIONS. IT DIDN'T COME CLOSE TO CONSIDERING THE NUMBER OF WINERIES, THE INTENSITY OF ON-SITE MARKETING ACTIVITY OR THE AMOUNT OF TRAFFIC THAT WOULD BE GENERATED.

MUCH CAN BE DONE ADMINISTRATIVELY IF THE WILL IS THERE. THE INTENT OF THE WDO IS CLEAR. STAFF MUST INTERPRET THE STATUTES MORE IN LINE WITH THAT INTENT AND MORE SUPPORTIVE OF THE AG PRESERVE. THE CUMULATIVE EFFECT OF ALL THIS DEVELOPMENT MUST BE CONSIDERED WITH A NEW EIR IF THAT CAN'T BE DONE.

ALL OF THE COMMUNITY STAKEHOLDERS NEED TO BE INVITED TO COMMENT IN THIS PROCESS. THIS MATTER GOES BEYOND THE GROWER AND THE VINTNER ORGANIZATIONS. THE SUCCESS OF THE REVITALIZATION OF THE CITY OF NAPA HANGS IN THE BALANCE. ONLY A UNIQUE WINE EXPERIENCE WILL GET THE CARS TO STOP AND SHOP AT THE NEW RETAIL OUTLETS. THEY WON'T STOP IF ALL THE ACTION IS UP VALLEY. WE NEED TO BE ONE COUNTY NOT SEPARATE CITY AND COUNTY FIEFDOMS. THE CITY OF ST. HELENA, THE SIERRA CLUB AND THE NAPA COUNTY LAND TRUST NEED TO BE INVITED TO PARTICIPATE.

BUT MOSTLY YOU NEED TO HEAR THE PEOPLE. I WAS A PLANNING COMMISSIONER FOR 6 YEARS AND HAVE PARTICIPATED IN THESE HEARINGS FOR 40 YEARS. NEVER HAVE I WITNESSED THE AMOUNT OF CITIZEN DISSATISFACTION THAT HAS OCCURRED AT THE CASTELLUCCI, YOUNTVILLE HILL AND NOW THIS RAYMOND WINERY HEARING... AND ON THE STREET AND IN THE NEWSPAPERS.

THE NATIVES ARE RESTLESS. THESE ARE REGULAR CITIZENS WHO ARE SO OUTRAGED THAT THEY ARE BRAVING THE DAUNTLESS TASK OF APPEARING BEFORE YOU FOR THE FIRST TIME. THEY DON'T LIKE WHAT YOU ARE DOING. USE PERMITS ARE DISCRETIONARY ACTIONS BY THIS COMMISSION AND THE BOARD. THE STAFF MAKES RECOMMENDATIONS. YOU MAKE DECISIONS.

IT'S DECISION TIME NOW. IT'S TIME FOR A CHANGE AND THAT CHANGE NEEDS TO START HERE WITH THE REJECTION OF THE RAYMOND APPLICATION.