



January 20, 2021

To: Chair Hopkins and Sonoma County Supervisors

Re: PLP20-0007

The Sonoma County Chapter of Community Alliance with Family Farmers (CAFF) has been informed that an EIR for the project referenced above—in which Jackson LLC has proposed initiating zoning changes to establish a luxury hotel on agricultural land, as well as other developments—is about to commence. We respectfully request halting this EIR and above application package from moving forward in the permitting process for the following reasons. We agree with the arguments against this proposal clearly stated in the letter submitted to your Board Jan. 15, 2021 by a coalition of environmental groups.

It makes no sense to allow the applicant to make the considerable investment in an EIR and for County staff to waste precious time and resources in evaluating a proposal that **staff has already deemed in conflict with existing policies and the General Plan's principal goals regarding the preservation of agricultural lands**. This proposal would also not meet spot zoning requirements.

Agricultural lands have been zoned as such in large part due to having soils capable of supporting crops or grazing. Parcels zoned for agriculture have soils in classes I – IV; these are the best soils and the County has wisely chosen to preserve them to feed future generations and remain the backbone of our local economy. The 15 acres which this project seeks to convert to K zoning, to build a hotel, are currently zoned Land Intensive Agriculture (LIA). LIA zoning indicates highly-productive agricultural soils; in confirmation, a technical study done recently shows that the site contains class III and IV soils.

Loss of ag land often occurs incrementally but adds up to significant losses over time. From 2000 to 2012, the acreage of farmland in Sonoma County decreased by 8 percent, while urban acreage increased 7 percent (Vital Lands Initiative, March 2018 draft).

Loss of agricultural land may be caused by multiple factors, including residential and urban development, conversion to other land uses such as rural estates, and commercialization, such as conversion to event centers and resorts—the last of which this project proposes.

The project also proposes to change the K zoning designation of a former golf course to Diverse Agriculture (DA), another primary ag zone. The intent seems to be to compensate for the loss of ag land for the proposed hotel. However, no agricultural production is planned for this site; instead, a public park is proposed. **This zoning change is not needed as a public park is already an allowed use in K zoning.** All agricultural zones – including DA – must be reserved for parcels where agriculture is an intended use.

We are very concerned about the precedents all these proposed changes would make. At a time when the climate crisis is fueling multiple disasters, our farmland is more precious than ever for its carbon capture, flood mitigation, and groundwater recharge abilities, and of course for food production. The County has committed to city-centered growth and reducing vehicle miles traveled. But allowing large hotels and the hosting of many special events would require increases in traffic in these rural areas. In addition, our existing visitor serving businesses such as restaurants, hotels, and entertainment/cultural centers are suffering badly from the many disasters of recent years; the last thing they need is more competition.

For all these reasons we ask the County to halt this EIR and permitting process and inform the applicant that the proposed land use changes will not be considered.

Thank you for considering our views.

Wendy Krupnick  
Vice president, CAFF Sonoma County

cc. Tennis Wick, County Counsel