

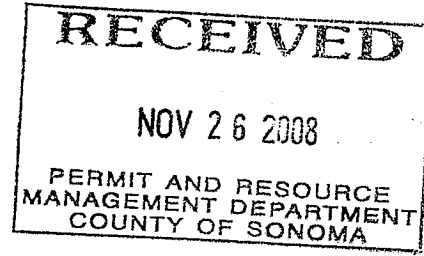


DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov

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November 24, 2008



Board of Zoning Adjustments
County of Sonoma
Permit and Resource Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Members:

Subject: Cornell Winery, SCH #2008102040, Mitigated Negative Declaration,
City of Santa Rosa, Sonoma County

The Department of Fish and Game (DFG) has reviewed the above referenced document. The Mitigated Negative Declaration (MND) represents the County of Sonoma's (County) environmental review of the applicant's request for a winery with a maximum annual production capacity of 10,000 cases. The proposal includes construction of an 18,670 square foot building and an 8,670 square foot cave for barrel storage. The project would require a substantial amount of grading (approximately 3,000 cubic yards) to terrace the site for the proposed buildings. The plans indicate space for approximately 22 parking spaces. A new water tank would be constructed for fire protection and domestic use. The building and caves would contain all winery operations and equipment. A 540 square foot kitchen is proposed in the 2,640 square foot hospitality area of the winery. The existing wells on the ridge to the northeast will supply the winery with water.

The 40-acre winery parcel is located on a private road, known as Wappo Road, off St. Helena Road, northeast of the City of Santa Rosa. Topography varies over the 40 acres, although the majority of the site is fairly steep with slopes up to 30 percent. The project parcel consists of oak and pine woodlands and open grasslands, although the building site is proposed to be located on two knolls bounded by ravines. The closest watercourse is an intermittent stream approximately 640 feet away, sometimes referred to as the North Fork of Mark West Creek tributary to Mark West Creek through a culvert under St. Helena Road. DFG has documented that the North Fork of Mark West Creek supports a run of Central Coast steelhead, a federally threatened species and may potentially support Central Coast coho salmon, a State and Federal endangered species. DFG has documented coho salmon in the mainstem Mark West Creek, downstream of the project site. Excessive input of fine sediment from hill slope runoff or from roads in the vicinity of the project site will likely have adverse effects on listed salmonids in the project reach as well as downstream of the project reach.



The MND and supporting documents state that the project requires about four acre feet per year (AFY) of water and return flows to the aquifer are about two AFY; therefore, the net usage or loss of base flow contribution is about two AFY. The MND estimates Mark West Creek has an average annual flow of 42,671 AFY and a dry year flow of 17,600 AFY; therefore, the net loss of two AFY is likely insignificant. The County should be advised that in coastal rivers and streams the majority, if not all, of the average annual flow in a watershed occurs during a relatively short period of time (i.e., December to March). Very little of the average annual flow occurs during the summer months when juvenile salmonids, fish, aquatic invertebrates and other fish and wildlife resources are most vulnerable to reductions in cool water from base flow provided by groundwater aquifers. Considering the relatively low flow conditions during the summer months in the project reach and the consumptive groundwater use by the proposed project, in conjunction with consumptive groundwater use by single family dwellings and vineyards in the vicinity of the project area, the effects of reduced summer base flow on fish and wildlife resources may be significant. DFG recommends the County provide a more thorough analysis of the cumulative effect of consumptive groundwater use on the summer base flow in the final California Environmental Quality Act (CEQA) document. This analysis should consider the needs of potentially occurring aquatic species, particularly steelhead and coho salmon, during all seasons and life-history requirements. Any adverse effects of reduced flow should be avoided, minimized, or mitigated to a level of insignificance.

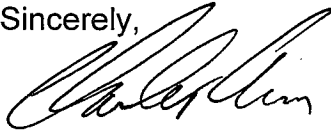
DFG is aware that vegetation at the project site has already been removed and grubbed. This vegetation consisted of oak and pine woodlands and open grasslands. These habitat types provide excellent habitat for wildlife. The unmitigated removal of these habitat types poses potentially significant impacts to terrestrial wildlife and plants including habitat loss, habitat fragmentation, habitat degradation, destruction of breeding sites, and restriction of animal movement, and the introduction or spread of exotic and invasive species. Unmitigated conversion of these habitat types to a vineyard or winery interrupts natural processes and eliminates the natural recruitment of habitat features, such as standing dead trees, downed woody debris, and cavity bearing trees. The unmitigated conversion of natural habitats is likely to reduce local availability of habitat for native plant and animal species. Considering that these habitat types recover slowly after disturbance, it is likely there will be a long-term loss of this habitat, due to the fact that replacement trees would not attain comparable size and structure over the course of many decades or more.

DFG recommends the final CEQA document incorporate mitigation measures to compensate for the removal of oak and pine woodland. DFG recommends that the County develop a vegetation management plan that would account for slow growth rate and the quality and quantity of habitat provided by these trees. For example, the County should develop mitigation scenarios for these impacts that should include setting aside, on-site or off-site, acreage for retention in perpetuity at a ratio of 3:1 for every acre of oak woodland habitat impacted. These sites should be maintained in

perpetuity and managed under an approved management plan with an appropriate monitoring and maintenance scheduled to be conducted for a minimum of ten years to ensure compliance. Furthermore, for individual oak trees with at least one trunk of two inches or more diameter at breast height or multi-trunked native oaks with aggregate diameter of five inches or more, the County should replace in-kind any oak tree removed with specimen trees (no less than 15-gallon size) with a total diameter equal to the individual or total combined diameter of the removed tree in a suitable location.

DFG appreciates the opportunity to comment on the proposed project. We remain available to be of further assistance to the County in finalizing the CEQA document. If there are any comments or questions regarding this letter please contact Mr. Dan Wilson, Environmental Scientist, at (707) 944-5534 or Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568.

Sincerely,



Charles Armor
Regional Manager
Bay Delta Region

cc: State Clearinghouse