

To: Department of Planning and Building  
976 Osos Street, San Luis Obispo, CA 93408  
Attention: Holly Phipps, MCRP

From: Karen Merriam  
1615 Tiffany Ranch Road, Arroyo Grande, CA 93420

RE: Greengate Farms SLO LLC and Greengate Farms Edna Valley, LLC  
Request for a Minor Use Permit:  
County of SLO Planning & Building Dept.  
Hearing, Sept. 2, 2016: Consent Agenda item #5  
Hearing Officer: Rob Fitzroy

Dear Ms. Phipps and Mr. Fitzroy:

I am submitting here further comments regarding the Greengate Farms Request for a Minor Use Permit. My initial comments, sent to Ms. Phipps by email on August 23, were written prior to receiving a copy of the Mitigated Negative Declaration.

As a neighboring resident in the Edna Valley, I am directly impacted by the large-scale development proposed by the Applicant. I will note below in summary form the specific concerns I have. Should I choose to appeal the decision to approve the project recommended by Ms. Phipps, that seems assured by its position on the Consent Agenda of the Sept. 2 Hearing, I will expand and clarify these concerns more fully.

To begin, I would like to note briefly that I did not request a Hearing on this matter because, according to the notices I received in emails from Ms. Phipps and Planner Sciong, a Hearing was already scheduled. I was not told that my comments did not constitute a Hearing request, nor was I informed of the necessity of and procedures for requesting a Hearing.

2. **The scope** of the Greengate project is such that it warrants a larger, more widespread noticing than the customary 300ft from the project site. Closer neighbors and I heard about the project application only by accident. In addition, while the MND is extensive it does not provide the level of scrutiny that such a large scale project as Greengate Farms requires. A full EIR should be conducted.

3. **Cumulative impacts:** As noted in the court ruling of June 23, 2016 in favor of the Save Adelaida appeal of an Event Center on Vinyard Drive in north county, cumulative impacts need to be addressed in the consideration of Event Centers “incidental to” ag operations.

I believe that the Greengate project should not be considered separately from the context of the event venues currently in operation proximate to the property. Specifically I will note:

**Loma Grande Ranch**, 2455 Corbett Cyn Rd Access directly across from new access drive of Greengate Ranch

Weddings and Events

**Claiborne and Churchill Winery** , 2469 Carpenter Cyn Rd. (hwy 227) Music events, Wine tastings, guest house, music

**Trinity Hall**, 6565 Edna Valley Rd (hwy 227)

All types of events, meetings, parties

**Holland Ranch**, 2275 Carpenter Cyn Rd.

Weddings, vacation rental

The cumulative impact of these events centers on many of the items discussed in the Greengate MND, such as noise, traffic, and air quality must be considered. For example, if each of these event venues holds an event on a summer day, which is likely, the potential for a large-scale traffic impact with all of its attendant negative impacts to air quality, safety, etc. will be significant.

**4. Prior Violations:** Since I drive past the Greengate Ranch property regularly, I have noticed grading and construction taking place over the past several months. Has this been permitted separately from the current application? Or is this part of the work itemized in the MND? I do not believe that the mitigations are being respected.

And was the event of July 23 held at Greengate, the music from which permeated the Edna Valley from Ormonde Rd. to Tiffany Ranch Rd, a permitted event? Or is the Applicant going forward with the project prior to approval? (I believe Ms. Phipps has noted in writing that Greengate has been conducting events without approval.)

Since Greengate Farms has already demonstrated its willingness to violate the regulations of the County and not to honor the mitigations that are conditional to the project, I do not understand rewarding the Applicant with approval of this project.

**5. Mitigations** are only as useful as the Applicants' willingness to abide by them. Throughout the MND, there are unrealistic expectations that the mitigations will be put in place and/or enforced.

Please see p. 68 of MND, BIO-5 and 8 which would effectively preclude operations involving music or night-time lighting from February 1-Sept. 15 and from November 1-April 30. That would leave January and October as the only months where operations could be conducted without having adverse impacts on biological resources, particularly birds.

BIO-11 states that renovation of structures in event area D will be avoided during April – August. This is precisely the area I have observed directly that has been under constant renovation during July and August.

With regard to noise, the past performance of Greengate Farms tells us that the mitigations stated in the MND have not been respected to date.

The MND itself presents problems: As an example: in the section related to water quality/hydrology one finds the statement:

“The project will not involve the construction of impervious surfaces.”

However, on p. 21 regarding Air Quality related to the Equestrian Facility, the following statement is found: “All access roads and parking areas associated with the facility shall be paved.” Obviously such inconsistencies need to be resolved.

Section 15 of the MND, LAND USE item d.) “Be potentially incompatible with surrounding land uses” the project was found to be “consistent”. This is a finding that could be contested, especially in relation to the “plus” categories of events in which up to a thousand people could be accumulated on the site for multiple events at one time. This is not the description of an event center that is incidental to the ag uses of the property. It is rather the tail wagging the dog. The event center(s) on the property have the ability to become the major income generator for the Farm.

In conclusion, Greengate Farms’ application for a Minor Use Permit for a large-scale event center is just another example of the widespread, increasing conversion of agricultural lands and historic buildings in the Edna Valley to become profit centers that offer events and accommodations for tourists and others, placing increasing strain on traffic, safety, noise, air quality, water, and other biological resources. Already the valley water basin is in critical level 3. The Greengate Farms project is taking to an extreme what others have already begun in the change of character of the Edna Valley from rural agriculture and residential to public accommodations and venues. At the least, this project should be scaled down even further and a complete EIR should be required.

Respectfully submitted,  
Karen Merriam

Karen Merriam  
1615 Tiffany Ranch Road  
Arroyo Grande, CA 93420  
(805) 440-2714

## Nicole Retana

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**From:** Holly Phipps  
**Sent:** Thursday, September 01, 2016 1:49 PM  
**To:** Nicole Retana  
**Subject:** Fw: File # DRC2012-00078

Hi Nicole,

Please upload this to our website for the Greengate project.

Regards,

**Holly Phipps**, MCRP  
North County & Winery Planner

### **Department of Planning and Building**

976 Osos Street, Room 300  
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805-781-1162  
<http://www.sloplanning.org/>

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**From:** Gerry <judgegerryb@yahoo.com>  
**Sent:** Thursday, September 1, 2016 11:12 AM  
**To:** Holly Phipps  
**Subject:** File # DRC2012-00078

Ms. Phipps; As I mentioned I was traveling and returned after time had expired to request a hearing vs. the current status as a consent agenda item. I had hoped to hear details about the hours functions would occur and noise regulations etc. I am a residential owner in close proximity to the property, for which permits are requested and therefore have vested interest in what transpires. Thank you for your attention.

Sent from my iPad