

#### 2023 Board of Directors

#### February 28, 2023

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Taylor Serres, Interim Executive Director

Laura McGilley, Communications & Social Media Manager RE: Winery Guidelines Feedback to Sonoma Valley Citizens Advisory Committee

To Whom It May Concern:

On behalf of the Sonoma Valley Vintners and Growers Alliance and all of our Vintner and Grower members of Sonoma Valley we have taken time to review your suggested guidelines and responded accordingly. Representing the most profitable industry and largest supplier of jobs in Sonoma Valley, our Vintners and Growers look forward to working with the Sonoma Valley Citizens Advisory Committee to build a better Sonoma Valley. We are eager to find a middle ground and compromise so that all parties can be heard and understood.

The existing PRMD process which assesses each winery on a case-by-case basis based on multiple factors is both thorough and detailed, and it recognizes the uniqueness of each winery and its operations. The one-size fits all or blanket approach the SVAC is proposing is not economically viable or conducive to the promotion of individual brands. Each winery has its own approach to doing business, which may involve regular tastings, direct-to-consumer events, or trade tastings. It is crucial to have a flexible and adaptable approach that recognizes the unique needs and challenges of each winery while ensuring compliance with regulations and standards. It's also essential to recognize and respect the individuality of each winery and its contribution to the valley's landscape and the community of Sonoma.

In addition, those businesses that have already gone through the permitting process and the costs associated should not be affected by said guidelines. Furthermore, these businesses should not be affected if they go back to PRMD for an amendment to their permit. Said grandfathered-in wineries should be left as such, just like homes, cars and the list goes on.

As neighbors and members of our community, some of us for more than 100 years and multiple generations, we look forward to preserving and sharing the beauty of Sonoma Valley. Those same reasons we all chose to reside in this beautiful valley are why we want to share the fruits of our labor with our guests.



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Laura McGilley, Communications & Social Media Manager We thank you for your time and consideration. We look forward to working with you and ensuring every voice is at the table to make decisions that have a direct impact on our community for the betterment of all of us in our community.

Sincerely,

Tom Blackwood, Buena Vista Winery

1. Bundsch

Katie Bundschu, Bundschu Company

Bart Hansen, Dane Cellars

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Steve Sangiacomo, Sangiacomo Family Vineyards



Chris Sebastiani, Viansa

Taylor Serres, Serres Ranch

#### The SONOMA VALLEY WINERY GUIDELINES INTRODUCTION

#### **Recommended Changes to the Draft Guidelines**

The Winery Events Ad Hoc Committee of the SVCAC is recommending <u>substantial changes</u> to the draft Guidelines presented to the SVCAC on 11/18/20 by Permit Sonoma. The <u>changes generally</u> intend to further restrict frequency and size of events, increase wineries' responsibility to and communication with other members of the community, and increase County oversight of winery operations which include visitors. Following are the most significant changes to the draft Guidelines that are recommended by the Ad Hoc Committee:

-Identify the entirety of the Sonoma Valley Planning Area as over-concentrated We are concerned with the overgeneralization of a large rural area of Sonoma County. Projects should continue to be evaluated on a case-by-case basis taking into account the size of project compared to proximity to neighbors, setbacks from road, road traffic, etc. -Limit the total number of events to 12 per year per winery.

The criteria for the number of events should be evaluated on project-by-project basis, taking into account the projects size and business plan. In addition, onsite parking, coordination with other major events in the area and other factors should determine the individual wineries capacity for number of events per year.

-Limit the concentration of wineries to two per half mile of roadway.

We are concerned with the logic for this restriction. Is the SVCAC trying to establish density of wineries? This restriction hurts the smaller wineries that could not establish a boutique winery adjacent to another smaller winery.

-Increase the minimum parcel size for tasting rooms from 10 acres to 20 acres.

We feel the original agreed upon parcel size of 10 acres, is restrictive enough in rural areas, and any restriction should only be applied to County lands not towns such as Kenwood or other towns that could have tasting rooms occupy commercial / retail spaces

-Limit the percentage of permanent structures to 20% for hospitality uses and to 10% for administrative uses.

We feel the guidelines should go back to the 25% ratio, as used in other counties and ideally should be based on the projects: size vs acreage, parking provided vs size of building, number of administratiion uses vs size of winery, etc.

-Require events to be cancelled when a red flag warning has been declared in the subject area. *This should be a County Board of Supervisors restriction for any event, not just winery related events.* 

#### Additional Recommendations to the County

In addition to reviewing and recommending changes to the draft Guidelines, the Ad Hoc Committee noted several recommendations that were included in the GHD Threshold Traffic Study that was presented to the SVCAC last year. These recommendations did not really fit in the Guidelines, but the Committee felt strongly that they should be pursued by the County. Three key elements were:

- A. Over concentration of wineries.
- B. Traffic congestion.
- C. The need for monitoring and management of permits once they are issued.

#### A. Over concentration of wineries

The recommendation regarding overconcentration is based upon the following considerations:

1) While some areas of the Sonoma Valley have a higher concentration of wineries than other areas, the respective areas themselves are not clearly defined.

**2)** New wineries continue to be permitted, increasing the likelihood that there will be greater density of wineries throughout the Sonoma Valley.

**Conclusion:** The Ad Hoc committee proposes that the entirety of the Sonoma Valley be considered an area of high concentration with proximity of winery proposals being considered on a site by site basis.

#### **B.** Traffic congestion

This is the single most troublesome condition of winery operations for neighboring residents. The Ad Hoc committee makes some specific recommendations in the body of the Guidelines, as well as other recommendations included in this introduction.

The Guidelines are for use by the SVCAC, permit applicants, and Permit Sonoma staff in reviewing applications. While conducting the review, it became evident there are traffic related conditions which deserve attention that will need to be addressed by appropriate agencies, but are not currently required by permit applicants themselves.

In the Threshold Traffic Study prepared for the County, and presented to the SVCAC, the consultants made several recommendations the Ad Hoc Committee urges the County to implement. These recommendations include the following:

#### 1) Improve County Road Design Standards

Improving current Sonoma County transportation design and engineering standards would address some of the primary roadway system transportation capacity, operations, and safety deficiencies. This would also include working with the State to widen roadway shoulders where necessary, and provide Class II Bike Lanes along Highway 12. However, factors including high improvement costs, increased travel speeds potential for environmental impacts, and effects on the rural character of Sonoma Valley and community values, are all considerations that make substantial improvements to the roadways a challenge.

#### 2) Employ Highway Capacity methodologies for safety calculations

Continue to use the approved Highway Capacity Manual (HCM) methodologies for two-lane highways to calculate roadway capacities and traffic operational conditions (Level of Service). Roadway classifications and corresponding measures of effectiveness should be based upon HCM. The same HCM methodologies account for the effects of geometric, traffic, and environmental factors including travel lane width, should width, travel speed, segment length, travel interruptions such as driveways and intersections, roadway horizontal and vertical curves, and delay due to passing restrictions. The Highway Capacity Software (HCS) implements the HCM methodologies and can be utilized to calculate this measure of effectiveness.

### 3) Improve Data Collection

Install, or coordinate the installation of, permanent traffic count stations within Sonoma Valley at strategic locations on State Highways and some primary County roads. The purpose of this effort is to start a long-term transportation database that allows monitoring of not only annual travel changes, but also Off-Peak and Peak Season travel fluctuations from month to month, and even from day to day.

The database will serve as a resource for transportation studies.

#### C. Manage and Monitor Permits

#### 1) Manage Industry-wide events.

The draft Guidelines pertain to some aspects of industry-wide events for individual permit applications, but do not address the overall permitting and operation of these events to manage them on behalf of affected neighborhoods. The County should work with the wine industry to adopt procedures and standards for the conduct of industry-wide events. Each such event should require prior County approval of a cultural event permit as it is presently codified in the Zoning Code. The County should also work with the wine industry to establish standards for the conduct of these events. The standards would build upon earlier industry efforts along these lines, but should include the following:

**a.** Larger events would be limited to off peak season and should be separated by at least a full month whenever they overlap a single geographic area to allow intermittent relief to the community of additional traffic impacts.

There should be no restrictions on what season a larger industry event can occur. Does this mean the Vintage festival can no longer beheld in October?

**b.** Public advertisements should be provided to the community so the impacted residents can plan for an increase in visitor impacts. Local newspaper, TV, radio and social media should be utilized to inform the public. The notification should identify all participating wineries. Portable message signing should be provided at least a week before the event.

This restriction should only apply if the Board of Supervisors imposes the requirement for all events in the County.

**c.** The event sponsor should verify that all participating wineries have a valid permit for their participation.

This is the responsibility of the participating winery and should not be imposed on the event organizer.

**d.** The event should be coordinated with other large non-winery events such as auto races and bicycle events so as to avoid overlapping schedules

In agreement, as no one wants gridlock or over concentration of events, wine related and just as often non-winery related events.

**e.** The event sponsor should limit the number of visitors at each winery to 50 persons at a time.

This should be evaluated on each projects capacity for parking and size of facility, not an arbitrary number.

**f.** Each participating winery should have a traffic and parking management plan and require parking attendants on event days.

This is already regulated and addressed in the wineries current Use Permit, as a standard course of business.

**g.** The event sponsor or participants should provide a shuttle bus plan each day of the event to minimize traffic.

Again, project size, location and number of parking spots that are on-site should determine if shuttle parking is needed. This requirement can also create more traffic and just moves traffic to another neighborhood.

Coordinate Events Calendar and Monitor Winery Tasting and Event Functions

While Permit Sonoma and the SVCAC can and must use the permitting process to set limits and use conditions for wineries to follow, the wineries' compliance with what is allowed in their Use Permit can be determined only by subsequent monitoring. At present most monitoring takes the

form of complaints, usually generated by neighbors or others who are affected by such problems as traffic and noise.

Complaints to Code Enforcement or Sheriff should be the cause for monitoring a wineries Use Permit.

A more standard method of monitoring and accountability must be established if the permitting process is to produce equitable and defensible results. The County should fund and maintain designated event coordinators and monitors, establish review periods, and introduce steps to improve winery compliance.

The County already has code enforcement officers and local Sheriff to address complaints from neighbors.

#### SVCAC Ad Hoc Committee Winery Event Guidelines Draft Resources

The information to prepare this draft of recommended Guidelines by the SVCAC Ad Hoc Committee was obtained from, but not limited to, the following sources:

- The Sonoma Valley Winery Event Guidelines draft presented to the SVCAC on 11/18/20.
- The GHD Threshold Traffic Study presented to the SVCAC on 1/27/21
- The Permit Sonoma workshop minutes from 2/18/21.
- The Dry Creek Draft Winery Guidelines
- The West County Principles document

- The noise standards document prepared for Sonoma County by Bollard Acoustical Consultants dated 11/12/16.

- Notes from the Wine Industry Events Working Group dated 2016-2018.
- Existing County staff and codes

## SONOMA VALLEY WINERY GUIDELINES--Approved 5.26.21

#### SVCAC WINERY GUIDLINES AD HOC COMMITTEE

## Purpose

The Sonoma Valley Winery Guidelines ("Guidelines") provide a local framework for evaluating use permit applications on land that is zoned Agricultural (DA, LIA, LEA). The intention of these Guidelines is to protect Agricultural Zones by advising how much winery-related activity is allowed on these lands, and by managing these uses in a way that minimizes cumulative impacts.

The Guidelines identify criteria that will be used by the Sonoma County Citizens Advisory Commission (SVCAC). The Guidelines affect applicants for a new winery or modification to an existing winery. The SVCAC will use the Guidelines to make recommendations to the Permit Sonoma staff, as well as the Board of Zoning Adjustments, Planning Commission and Board of Supervisors.

We need a better definition of why SVCAC "Guidelines" should be the standard over current Zoning regulations and Ordinances established for County of Sonoma. We also need a specific map of the highly concentrated areas within the Sonoma Valley versus a broad generalization. In addition, the SVCAC nor the County should use these guidelines to take away already approved uses when a winery modifies their current Use Permit.

The Guidelines are also intended to advise applicants on the design of their projects. Each project is regarded as unique in the evaluation process, and each will be reviewed on a case-by-case basis by the SVCAC and by Permit Sonoma.

The SVCAC should not be involved in the design process, as the design element is already reviewed under current zoning regulations. The County also has an established Design Review Committee to review designs and their conformance with design review regulations.

With respect to these Guidelines, the following should be noted:

1. While decision makers should make every attempt to follow the Guidelines, the circumstances of each particular application and site may suggest that deviations are appropriate.

We agree that the "decision makers" should make the final decision and the SVCAC should only review and comment on projects specifically in the identified "over concentrated" areas. This same logic should apply to items 2 through 4 below.

For Example: A project applicant may have a parcel that he/she feels would make a good winery site even if the site does not meet the Guidelines for minimum parcel size. The application is for production and processing and does not include a tasting room or events. The site is very compatible with the neighborhood...good noise attenuation, etc.

In a case like this the CAC may feel that the project could be recommended in spite of the smaller parcel size.

2. Where these Guidelines establish a maximum level of usage, the permit decision may not ultimately provide for that level.

For Example: A project applicant proposes a winery and tasting room with the maximum number of events allowed under the Guidelines. However, the site is constrained due to topography, nearby residences, parking, etc. etc. In a case like this, the CAC may feel that a lesser number of events is necessary in order to minimize these problems.

3. A currently permitted project remains subject to the conditions of that permit and is not affected by these Guidelines.

For Example: A winery project that was previously approved with a smaller number of events than allowed under the Guidelines does not automatically get to hold the larger number based upon the new Guidelines. However, the owners could apply for a use permit to increase the number of events. Similarly, a project that was approved for a greater number of events would be able to continue at that level.

4. These Guidelines are intended to complement County regulations. Many issues pertaining to winery permits are addressed through existing County policies, codes, and practices and are not thought to necessitate further guidance in these Guidelines.

For Example: The Guidelines do not include some of the more common aspects of a project, such as septic capacity, building codes, and drainage requirements.

# **Definitions:**

**Event.** A gathering of 30 or more people at a pre-scheduled date and time, whether or not a fee is required to attend. Gatherings of less than 30 people are considered to be regular day to day activities of the applicable use, unless otherwise identified in the use entitlements. Some events last for two or three days. In these cases, each day is counted as a separate event.

For Example: A tasting room that is open all day every day for walk-in customers would not be considered an event, regardless how many visitors were to attend during the open hours. However, a scheduled gathering...maybe a wine club release party or a charity fundraiser, say on a particular day or night, would not be an event unless it were to involve more than 30 people.

This number is too low, and should again be based on the size of the project, not an arbitrary number. We suggest a tiered approach to defining an event: 30-50 small, 51-100 medium and 101 and above for larger wineries.

Sonoma County event definitions should be the standard for this section. Also, note comments above on these topics related defining "highly concentrated areas."

**Agricultural Promotion Event.** An event that is directly related to the sales and promotion of the agricultural product from the site or local area. Examples include wine club gatherings, wine club releases, wine trade gatherings, and regional tastings as part of Industry-Wide Events.

**Industry-Wide Event.** An agricultural promotion event that is sponsored by a recognized wine industry association involving multiple wineries or tasting rooms within a specified geographical area.

**Private Event:** An event other than an agricultural promotion event, such as fundraising for charities, ballot measures, political campaigns, and similar purposes, or parties, concerts, weddings, celebrations, etc.

**Winery.** An agricultural processing facility that produces wine from wine grapes. A winery may include crush areas, production rooms, case goods and barrel storage, tank rooms, warehouses, bottling lines, laboratories, and administrative offices.

**Tasting Room.** A visitor serving use accessory to the production and/or processing of agricultural products. A winery tasting room would include the sampling and retail sales of wine made from locally grown wine grapes and other wine related products.

Event Space. An indoor or outdoor part of a winery or tasting room used for hosting events.

**Locally Grown Agricultural Products.** Agricultural products that are primarily grown and produced within Sonoma County and/or at neighboring counties in close proximity to the proposed use.

**Over-Concentration.** Over-concentration of visitor-serving and recreational uses can occur where several wineries, tasting rooms, and events are located in the same area or along the same route. An over-concentration of uses occurs when:

1. road conflicts occur where traffic conflicts with pedestrians, bicyclists and motorists from the local neighborhoods;

2. traffic levels exceed General Plan objectives on a specific or cumulative basis;

3. groundwater drawn to serve the facilities negatively impacts the aquifer and surrounding neighbor's wells; and

4. the uses are detrimental to rural character of the area.

5. more than two (2) winery and/or tasting room facilities are located within a ½ mile stretch of road.

## **Siting Criteria**

#### Winery Siting Criteria:

**A. Access.** Public roadways of at least 18' in width are required. The applicant must show that the design will address:

1. Ingress/Egress. Follow County standards for ingress and egress to the property.

2. Sight Distance. Follow ASHTO sight distance standards.

**3**. Parking. "No Parking" signs should be installed and enforced along adjacent County roads.

This should only be required if onsite *parking does not accommodate capacities anticipated by visitors or staff.* 

4. Traffic. Traffic impact analyses shall assess impacts based on project-generated trips as well as a scenario where project-generated trips are inflated by 20% to account for cumulative impacts in the Sonoma Valley concentration area.

All applicants are required to do traffic studies and this analysis should determine if there is a cumulative impact and not by adding an arbitrary *20% uptick for winery traffic* 5. Potential evacuation guidance and routes shall be posted on site.

This is a Fire Department issue and already regulated, so it should be removed from the guidelines.

**B. Setbacks.** Setbacks will be site specific and follow Sonoma County zoning standards from all applicable property lines. These setback standards will also apply to parking lots.

**C. Noise Attenuation.** When considering the proposed activity and intensity of use, the proposed use must meet the standards of the General Plan Noise Element. In addition, no outdoor amplified sound is allowed during events. Noise attenuation strategies, including setbacks from property lines and noise muffling interventions, may be combined to meet this standard, however permanent structures and installations for noise muffling must meet Scenic Resource requirements.

*County regulations should be the standard for noise attention and outside amplified music.* 

**D. Visual Impacts.** Facilities should be sited to minimize visual impact, especially in scenic areas/corridors. Setback distances shall be designed to ensure that the visual impacts of the new facilities are minimized.

As stated above, the County has a Design review guidelines and process and the SVCAC should allow that group to decide visual impacts of projects.

**E. Lighting.** Nighttime lighting levels shall be limited to what is necessary to provide security and safety for users. Setbacks shall be sufficient to limit light visibility from public travel ways and to maintain the rural and scenic qualities of the Sonoma Valley. Exterior lighting shall be consistent with Dark Sky standards (e.g. low mounted, downward casting and fully shielded to prevent glare).

The Design review guidelines for lighting and visual impacts are already established in the Zoning code, so there is no need for this section.

**F. Maximum Winery Size.** Winery size should be the minimum necessary to process the proposed level of wine grape production that will supply the winery.

For example: The extent of the processing operation should always be in proportion to

the proposed production of wine grapes. This is a judgment call for CAC members, BZA members, or Board members as there is not a standard square footage that fits every project. Red wine is different from white wine in terms of the size of the facility. The key is to examine the specific uses of each portion of the facility and be satisfied that the proper relationship exists.

The SVCAC should not be making "judgment" calls but leave it to the Planning Commission and Board of Supervisors when deciding the size of a winery. There is real concern that members of the SVCAC are against winery events and thus their judgment is focused on <u>further restrict (ing)</u> frequency and size of events at wineries.

## **Tasting Room Siting Criteria**

**A. Tasting rooms** are subject to the same Guidelines identified in subsections A-E above. Standalone tasting rooms are not allowed. Tasting rooms should be secondary and incidental to the proposed levels of production and processing.

For example: Similar to the previous example for winery size, the extent of facilities for visitor serving uses should be proportional to the extent of wine grape production and/or wine-making. A small production winery should not include a large tasting room or event space, but this is also a judgment call for CAC and decision makers. Again the key is to examine the specific uses of each portion of the facility.

Please note comments above related to this subject. The SVCAC should leave these "Judgment" type of decisions up to the Planning Commission and Board of Supervisors.

**B. Minimum Parcel Size**. The minimum parcel size that is required to qualify for a tasting room is 20 acres. An exception may be made to this minimum when the applicant is a small agricultural producer.

The parcel size for any project should be based on Sonoma County Zoning regulations and not an arbitrary number.

#### C. Maximum Site Area for Tasting Room and Other Accessory Uses.

The size of the facility should be secondary and incidental in proportion to the proposed production and/or processing of the winery.

Permanent structures for hospitality uses are limited to 20% of the total size of all of the non-residential buildings on site.

Permanent structures for offices and other administration purposes are limited to 15% of the total size of all of the non-residential buildings on site.

Again, the Zoning regulations should determine the size and percentages dedicated to structures on a parcel.

**D. On-Site Parking.** The following on-site parking is required for tasting rooms and events: AdHoc Version 5/26/2021 1. 1 space per 250 square feet of the winery production facility; plus

1 space per 2.5 guests and 1 space per employee for the tasting room and events.
Where events are proposed that could exceed the parking provided on-site, shuttle service shall be provided to transfer guests to and from off-street parking locations. Shuttles from off-site public parking areas are required, for all events with over 50 guests.

4. No parking is permitted along any public or private roadways or on vineyard roads.

This section again does not account for locations that have enough on-site parking and thus the shuttle requirement would only increase the traffic impact on another neighboorhood.

E. Separation Criteria. The entire Sonoma Valley is considered either to be over-concentrated or to become over-concentrated in the near future. Wineries and tasting rooms are limited to 2 per half mile.

#### Again, we have concern about language that states all of the Sonoma Valley is overconcentrated with wineries.

F. Source of Wine Grapes. Wines offered for sale or tasting should be produced from at least 75% grown in Sonoma County.

Again, another regulation where the SVCAC is stepping out of their authority, as this type of regulation, if needed, should be consistent County wide and established by the Board of Supervisors

# Winery, Tasting Room, and Event Operating Standards

**A.** Hours of Operation. The hours of operation for wineries-and tasting rooms shall be limited to 10 am-5 pm.

The hours of operation for Events shall be limited to 10am 9pm. All cleanup after the events shall occur by 10 pm.

This should be a County wide standard, traffic studies have shown that a later closing time can reduce traffic impacts. Als, the County standard for ending events is 10pm including event clean-up.

The owner/host or other responsible party shall cancel events during any period when a red flag warning is in effect for the subject area.

Again, this should be an County regulation, as it has nothing to do with over concentration of wineries.

**B. Food Service.** Food service is allowed for wine and food pairings or in conjunction with activities and events, provided that the primary activity in the tasting room shall be wine tasting related to wine sales and wine marketing, not dining.

1. A restaurant is prohibited.

2. Catering is acceptable and may include indoor, but not outdoor equipment such as stoves, wood-fired ovens and barbeques.

3. Sale of pre-packaged foods in conjunction with wine tasting is allowed per County standards.

County regulations and the Health department govern food service and what and where equipment is allowed. Also, many buisnesses lack indoor cooking facilities for catering and thus the caterers bring in equipment for use outdoors.

**C. Food and Wine Pairing.** Daytime food and wine pairings may occur during tasting room hours, subject to the following conditions, and only with food prepared off-site. Food and wine pairing is allowed in the evening after 5pm only in conjunction with approved events, and the food and wine pairings must be selected by the winery, with no menu options allowed.

Again, Zoning code regulates this topic and the requirement that all food be made off-site is punitive and adds to traffic and impacts. Food pairings should be encouraged at wineries, as it slows down consumption and reduces trips between wineries.

**D. Private Guest Accommodations.** Private marketing accommodations and agricultural farmstays are allowed as regulated by the Sonoma County Zoning Ordinance.

**E. Agricultural Promotion Events.** The purpose of agricultural promotional events is to promote local agricultural products grown or processed on-site or the local area. When phased projects are approved, the promotional events shall at all times be subordinate to the winery production itself. The owner/host, or other responsible party shall provide community notification of events.

# This restriction should only apply if Board of Supervisors imposes the requirement on all events in Sonoma County

**F. Industry-wide Events.** Industry-wide events are considered to be agricultural promotion events. Each participating tasting room is limited to the total number of events specified in the Use Permit. Industry-wide events shall:

1. meet the requirements, and follow the best practices, of the association sponsoring the event.

- 2. provide a plan for overflow parking
- 3. shall not allow parking along public roadways.
- 4. provide community notification of the event.

Again, the SVCAC should allow the future County ordinance define the rules for Industry wide events.

**G. Private Events.** Private events, such as fundraisers and concerts, typically occur on one day. Private events must end before sunset and shall provide community notification in advance of the event.

Again, hours of operations should dictate the timing of events not when the sun sets. In addition, fundraiser for local non-profits and politicians should not be considered a private event, as these types of events are for the Community, and thus these guidelines are hurting the Community and local non-profits.

**H. Maximum Number of Events.** The total number of events, including agricultural promotion, industry-wide, and private events are limited to a maximum of 12 per year. In addition, events are limited to one per month, except that the one in a month may be an industry-wide event lasting up to 3 days.

The size of the Winery and location should determine the number of events, and the limiting events to one per month is not realistic especially when combined with the "Sunset" rule, so essetiannly no events after 5pm during winter months.

**I. Event Space.** No permanent structure dedicated to events shall be constructed or maintained. Events may be held in any indoor or outdoor area that is commonly used for the winery or tasting room facility.

Dedicated rooms for wine club members, public and wine related events, should be allowed and called out in a Wineries Use Permit.

**J. On-Site Coordinator.** All activities and events must be hosted by the proprietor or have onsite management by the proprietor's staff. A designated person on the proprietor's staff must be available at all times during the events to address complaints or resolve problems. The On-Site Coordinator shall:

1. provide a telephone number listed on the winery's own website through which neighbors and members of the public will have a direct way to make any complaints; and

2. send out a notice to site neighbors to inform them that the "complaint hot line" is available should they wish to call.

A Winer phone number can be found easily online and any type of public notice should only become a requirement at the County level.

**K. Event Proposal.** Event coordination is the key to improving the over-concentration problem in Sonoma Valley and should apply to all events. Each application shall clearly state the type of events, the number of events, and the number of attendees for each event.

Since the mid-1990s, the County has included a condition in all Use Permits for all newly approved wineries that requires the winery to comply with any event coordination program that may be adopted in the future. All new winery permits also carry this condition. The combined effect is that all winery-related use permits issued from the 1990s through the present already have this particular condition of approval.

The approved event plan should be clearly set forth as a standard Condition of Approval in all new use permits and should include provisions for event coordination.

In order to monitor the effects of the permit, and to confirm that it is being followed, the Use Permit should require that data regarding the numbers of visitors from each winery event and the total tasting room attendance for the previous year be submitted to the County annually.

This standard Use Permit requirements is already in place and thus the guidelines do not need to call out this requirement.

**L. Traffic Management Plan.** Traffic management and parking plans are standard conditions of approval for new and modifications of winery use permits. These plans should take into account the maximum number of people visiting the tasting room during tasting room hours as well as during any event.

This standard Use Permit requirements is already in place and thus the guidelines do not need to call out this requirement.

**M. Over-concentrated Area Map.** The attached map of the Sonoma Valley Planning Area is the area that is considered to be over-concentrated. [Permit Sonoma to provide map]

This map is too broad and overreaching. The SVCAC area of focus, should be defined by specific individual areas on this map where over-concentration has been established by scientific data that supports why the area is over concentrated and be a detriment to the immediate neighbors and specific transportation issues.



