

**From:** [Linda Kay Hale](#)  
**To:** [PRMD-WineryEvents](#)  
**Subject:** Comments  
**Date:** Thursday, May 20, 2021 2:38:37 PM

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EXTERNAL

To the Sonoma County Planning Commission and the Sonoma County Board of Supervisors:

This long-awaited Winery Events Ordinance is a huge disappointment. It continues the tradition of allowing wineries and event planners to self-regulate and will only be monitored when renewing a permit which only happens if a winery or tasting room wants to expand. Current conditions, including traffic, cannot be ameliorated by studies done by the very wineries who are applying for the expansions and more events.

The Sonoma Valley Capacity Study, for example, only looks at current industry wide events and not all of the many winery individual events! Future traffic patterns are listed as “unpredictable” at peak times already and everybody should take a bus or trolley to events? What about the folks who choose to do their own tours? What about egress and ingress at large events onto two lane highways? What about new wineries?

“Unpredictable” does not solve the current problems. New developments and cannabis grows along with their businesses will impact water and traffic all year round.

This study, along with the previous \$90,000 voluntary events “calendar” that no winery ever used, does not fairly or realistically address the issues or cumulative impacts.

Sincerely,  
Linda Hale  
1500 Warm Springs Road  
Glen Ellen, CA 95442

Sent from my iPhone

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**From:** [David Eichar](#)  
**To:** [PRMD-WineryEvents](#)  
**Subject:** Question on proposed Winery Events Ordinance  
**Date:** Thursday, May 27, 2021 10:34:35 AM

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EXTERNAL

Hi,

I have a question on the proposed Winery Events Ordinance. Part of the language of the ordinance states, "5. Wineries and tasting rooms shall not be rented out to third parties for events." Does this mean that weddings and wedding receptions are basically prohibited?

Thanks,  
David Eichar  
Boyes Hot Springs

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**From:** [Christina Meyer](#)  
**To:** [PRMD-WineryEvents](#)  
**Cc:** [greg99pole@gmail.com](#); [Jacquelynn Ocana](#); [p.davis479@gmail.com](#); [todd.tamura@gmail.com](#); [Kevin.Deas@deasproperties.com](#)  
**Subject:** Winery Event Ordinance  
**Date:** Thursday, May 27, 2021 2:13:11 PM

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May 27, 2021

Dear Planning Commissioners:

While I am not opposed to the winery ordinance coming before you June 3 there are some changes needed to clarify the permitting process and reduce land use conflicts. What is missing in this ordinance are clearly set forth guidelines and criteria that will ease the workload of those in the Permit Department and speed the review of new permit applications and modifications to existing permits. The ordinance as written is not sufficient for that purpose.

Here are some suggestions:

- 1- Revise definitions to close loopholes, remove inconsistencies and enhance enforcement. For instance, the ordinance as proposed allows for 2 types of gathering when in actuality all of the food serving gatherings are events and should not be separated into types. That is an enforcement nightmare for the County.
- 2- Clarify the ordinance to ensure that an existing permit use is not automatically included in the new ordinance. Commonly called "Grandfathering" the ordinance needs to make clear that an existing use permit must be modified by the applicant and reviewed again by the Permit Department under the new guidelines if the applicant wants events and gatherings that are part of the new ordinance but were not covered under their current use permit.
- 3- Adding siting criteria to address neighborhood compatibility and road safety issues as well as preventing new areas of over-concentration. There are currently 3 major areas involved and the criteria can be area specific and easily followed when the Permit Department reviews applications and assesses enforcement. New site areas can be added as needed.

These are not difficult corrections to make to the ordinance and it will actually enhance staff's ability in processing permit applications and enforcement.

A letter from Preserve Rural Sonoma County sent to you provides additional information and background.

Thank you for your attention to these corrections.

Christina Meyer  
1008 Hawthorne Circle  
Rohnert Park CA 94928

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**From:** [Karen Giovannini](#)  
**To:** [Hannah Spencer](#); [PRMD-WineryEvents](#)  
**Subject:** Comments about Draft Winery Events Ordinance  
**Date:** Thursday, May 27, 2021 8:36:48 AM  
**Attachments:** [202105 KG comments for winery events ordinance.docx](#)

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Hello Hannah and Winery Events Planner,

Attached are my comments and suggestions.

Note: I purposely did not include my title and office on the document.

Great work! I know this is going to cause some angst, but as they say, you know the ordinance is balanced when everyone is grumbling a bit. Best wishes in finding that balance.

Thank you,

Karen Giovannini

(Ag Ombudsman, UCCE Sonoma County)

## Draft Winery Events Ordinance – Comments due May 28, 2021

To: PRMD-WineryEvents@sonoma-county.org

From: Karen Giovannini

RE: Comments for the Winery Events Ordinance

The focus of these comments is on *non-winery farming and ranching*, including non-winery agritourism. These comments/suggestions are to clarify that there is a difference between 'Winery Events' and non-winery 'On Farm Events' in the hopes of keeping non-winery agritourism separate from winery tourism – admittedly they do overlap, especially for wineries that also grow and sell produce and/or livestock products.

### Exhibit "B" 26-18-260 Winery Standards

#### Terms and Phrases

Suggestion: in Terms and phrases, make 7 & 8 subs to #6 and add 'Wine' to all types of winery events to avoid confusion with agritourism that is *not* at a winery (e.g., Agricultural Experiences, seasonal events such as blueberry harvest, pumpkin patches, Christmas tree farms, Farm Trails weekends, and so on):

D. Terms and phrases used in this section are defined as follows:

6. Winery Events means events held at wineries and tasting rooms for the purpose of promoting and marketing agricultural products grown or processed in the County. Winery events are secondary and incidental to agricultural production activities occurring onsite and/or in the area and are consistent with General Plan Policy AR- 6d. There are two types of winery events: Agricultural-Wine Promotional Events and Industry-Wide Wine Events.

~~7.a.~~ Agricultural-Wine Promotional Events are directly related to public education, sales and promotion of agricultural products to consumers, including but not limited to: winemaker lunches, dinners, release parties, and wine club parties and similar events.

~~a.b.~~ Industry-Wide Wine Events are promotional activities sponsored by a recognized wine industry association that may involve multiple wineries and/or tasting rooms. Industry-wide events are held within a specified geographic area, during regular tasting room hours, and may last up to 3 consecutive days.

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#### Food Service

**Clarification:** in Foods Service, **e(2)** not sure why "Retail sale of pre-packaged food is allowed for *on-site consumption only*." Some wineries sell pre-packaged food they make from their own *farm grown products* (e.g., breads, cheeses, jams, olive oil, and so on) it seems like those items should be allowed to be purchased to eat off-site and/or as gifts.

AND **e(3)** *indoor seating not allowed in conjunction with retail sales of pre-packaged food*. If the winery offers snacks to eat while wine tasting and eating those snacks is allowed in an outside seating area, why not also allowed in an inside seating area?

## Draft Winery Events Ordinance – Comments due May 28, 2021

*These next comments are not directly related to the Winery Ordinance but included because of Exhibit A.*

### Exhibit “A” 26-6-030 Table 6-1 Amendments

Table 6-1: Allowed Land Uses in Agricultural and Resource Zones

**P\*** = Permitted Use, subject to *discretionary* approval criteria

**Clarification:** Is P\* the same as a zoning permit? Because a Zoning permit is *not discretionary*. But since I know a Zoning Permit is required for Ag Processing, Small Scale, and the designation of “P\*” was used, I assume that is what it means.

**Suggestion:** change the definition of P\* to subject to ~~discretionary~~ ministerial approval criteria

OR if that is *not* what P\* stands for, **ADD** Z Zoning Permit required subject to ministerial approval criteria

**Suggested** edits based on those recommendations:

Land Use	LIA Zone	LEA Zone	DA Zone	RRD Zone	TP Zone	Use Regulations
Agricultural Processing, Small Scale	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	-	26-18-040; <del>26-88-210</del>
Lodging: Agricultural Farmstay	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	-	26-28-110; 26-88-085
Lodging: Agricultural Marketing Accommodations	<b>C</b>	<b>C</b>	<b>C</b>	-	-	26-28-120; <del>26-88-086</del>
Lodging: Bed and Breakfast (B&B)	-	<del>Z</del> <u>C</u>	<del>Z</del> <u>C</u>	<del>Z</del> <u>C</u>	-	26-28-130; 26-88-118
Lodging: Hosted Rental	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	-	26-28-140
Lodging: Vacation Rental	-	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	<del>P*</del> <u>or</u> <del>Z</del>	-	26-28-160; 26-88-120

**From:** [Wendy Krupnick](#)  
**To:** [greg99pole@gmail.com](#); [Jacquelynn Ocana](#); [p.davis479@gmail.com](#); [todd.tamura@sonoma-county.org](#); [Georgia McDaniel](#); [Hannah Spencer](#); [PRMD-WineryEvents](#)  
**Cc:** [Tennis Wick](#); [district3](#); [district5](#); [district4](#); [Susan Gorin](#)  
**Subject:** Draft Winery Event Ordinance  
**Date:** Friday, May 28, 2021 4:01:47 PM  
**Attachments:** [Winery Events- CAFF 5-28-21.pdf](#)

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Dear Planning Commissioners and Planners,

Please find the attached comments from the Sonoma County chapter of Community Alliance with Family Farmers, (CAFF), regarding the draft Winery Events Ordinance on your agenda for June 3, 2021

Thank you for considering our comments and suggestions.

Wendy Krupnick

Vice-president, CAFF Sonoma County

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May 28, 2021

To: Sonoma County Planning Commission  
Georgia McDaniel, Planner

cc: Tennis Wick, Director Permit Sonoma

Supervisors Lynda Hopkins, Chair; Susan Gorin, David Rabbitt, Chris Coursey, James Gore,

Re: Draft Winery Events Ordinance

Dear Sonoma County Planning Commissioners and Ms. McDaniel,

The Sonoma County chapter of Community Alliance with Family Farmers (CAFF) appreciates the work Permit Sonoma staff has done to draft the long-awaited and much-needed Winery Events Ordinance. While we were pleased with several of the provisions included in the Draft Ordinance, we feel that the current draft proposal has many inconsistencies and loopholes so some modifications will be required to achieve the intended goals of protecting the primacy of agricultural production on agricultural lands, providing clarity on standards for visitor services to the wine industry, and limiting impacts to rural roads and neighborhoods.

We agree with the detailed comments and suggested changes submitted by Preserve Rural Sonoma County this week. In addition, we would like to bring attention to the following issues and proposed solutions with sections of the Draft Ordinance referenced where applicable:

1. In defining terms and phrases for Winery Standards, it is important to clarify that the definitions are specific to wine and wineries so they are not confused with other types of agricultural events or services. Specifically, the term "Agricultural Promotional Events" should be changed to "Wine Promotional Events" (*Section D-7*), "Industry-Wide Events" should be changed to "Industry-Wide Wine Promotion Events" (*Section D-8*), and "Sales Activities" should be changed to "Wine Sales Activities" (*Section D-11*).
2. The Draft Ordinance defines "Winery Visitor Serving Activities" as being "part of normal winery and tasting room business operations." Parties where full meals are served and where gatherings after normal tasting room hours are not part of normal tasting room business, so must be considered as events. This includes pick-up parties, harvest parties, and Wine Trade parties. (*Section E*)
3. The County should encourage agricultural diversification and allow a variety of farm-produced products to be sold on-site. Off-site consumption of local food and food products, eg., olive oil, table olives, canned salsa, jam, and applesauce, sold at a tasting room should be allowed. (*Section E-7*)
4. The ordinance should have clear definitions and be enforceable. Specifically, how will "local food and food products" be defined and enforced? (*Section E-7*)





5. In order to provide clarity for all, and to be enforceable, there should be mention in the Ordinance of the presence and role of the Area Guidelines that are proposed for the areas of the County that are considered to be "over-concentrated". Definitions and criteria should be provided regarding what an "over-concentrated" area is, as well as information on accessing proposed Area Guidelines. There should be indication regarding how an area experiencing accelerated development in the future can be designated as "over-concentrated" and the procedure for doing that. Current proposed Area Guidelines seem to be an overly complex yet ineffective and unfair layer of bureaucracy. **We recommend that the most restrictive provisions of the Area Guidelines should be incorporated into the Ordinance, and should apply county-wide.**
6. The Ordinance should include explicit provisions to identify, and if possible prevent, new areas of concentration.
7. Any new winery proposal should include an analysis of its effect on the cumulative impacts of wineries in the region, and must be evaluated for water availability and Vehicle Miles Traveled by both staff and visitors.
8. Climate considerations must be included in all ordinances if the County is to be seen as serious about meeting stated State and local climate goals.
9. The size of tasting room and other visitor serving areas must be proportionate to winery production capacity, which itself must be based on wine grape production acreage on site or sites owned within a designated proximity. The ordinance should establish a maximum site area devoted to tasting room and visitor serving uses to ensure the use is incidental to agriculture. We recommend that only one tasting room be allowed per site in agricultural zoned lands, and that tasting rooms be permitted only where grape growing and processing takes place,
10. The size of the processing areas the number of custom crush operations in agricultural zones should be required to be proportionate to vineyard production,
11. The need for monitoring and enforcement has been repeatedly called for in public comment and are critical to the effectiveness of the Ordinance, yet they appear to be missing from the draft. Our earlier recommendations on this are included below:
  - Establish an annual monitoring and educational program to periodically review use permits.
  - Require events to be calendared at the beginning of each year, and require annual reports including quarterly information.
  - Require that the applicant hire staff or contract for services to respond to complaints of event activities or other infractions (i.e. parking/noise) including on nights and weekends.
  - Increase fines and penalties for unpermitted event activities.
  - Place a time limit for existing wineries which have been hosting events without a use permit to obtain use permits and impose significant fines on any that do not meet that



deadline. Include the cumulative impacts of existing and “historic” wineries and/or their events in mitigations and in the analysis of cumulative impacts over time

- Require fees for permits that cover administration and monitoring of programs, including traffic/road impact fees.
- Develop and execute an improved system for notifying local area residents of permit applications.

As we have previously noted, although many farmers and ranchers welcome the opportunity to host the public and educate them about their products and practices, the business of hospitality is not the same as the business of agriculture. We believe the multiple benefits of preserving agricultural lands for agricultural production are essential for the long-term health of our society, our economy and our planet, and we strongly urge that the demands of the hospitality industry not be allowed to interfere with the protection of those benefits in Sonoma County.

Sincerely yours,

Wendy Krupnick, Vice President, CAFF Sonoma County

**From:** [Nick Frey](#)  
**To:** [PRMD-WineryEvents](#)  
**Subject:** Winery Events Ordinance 5 28 21  
**Date:** Friday, May 28, 2021 10:39:14 AM  
**Attachments:** [Winery Events Ordinance 5 28 21.pdf](#)

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Attached are my comments. Thank you for the opportunity for input.

Nick Frey  
Balletto Vineyards  
707-291-2857  
[www.Ballettovineyards.com](http://www.Ballettovineyards.com)



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May 28, 2021

To [PRMD-WineryEvents@sonoma-county.org](mailto:PRMD-WineryEvents@sonoma-county.org):

I appreciate the staff's report on the proposed Winery Events ordinance. It has outlined key concepts that will help reduce the ambiguity of the Winery Use Permit process. I feel however some additional clarifications of definitions for Events and Activities are needed. In addition, the term Rural Character is not defined, and the use of "parties" does not represent most winery Activities or Events. My comments follow.

- Activity/Activities -Activity needs to be defined as a normal business activity to promote product sales. Limit its use unless it is the defined Activities term, e.g. events activities is confusing two terms that each should be capitalized and in the definitions list.
- Rural Character is undefined and likely 10 people when asked will give 10 definitions. Given it is used in the AR section of the General Plan, it would seem it should have an agricultural definition, i.e. farmers, not rural residents.
- Parties is undefined and again implies many things to many people. The ordinance should not use the word. Wine Club pick up Activities normally occur during tasting room operating hours and do not have a party atmosphere. These are not like a Cinco de Mayo or St Patrick's day party residents my have at their homes or back yards. Wineries too need to be sensitive to using "party" to describe Activities during tasting room hours.

The wording needs to be tightened for an ordinance and key terms need to be defined in a definitions section and used consistently. Vague terms like party or rural character should not be used unless defined. The General Plan's Ag Resources section sets the guiding principles in AR 4a: Residential uses in rural areas need to recognize the primary use (agriculture, its processing and visitor serving uses) may create traffic and agricultural nuisances. AR 8b Encourages promotion and marketing of agricultural products. There are other codes or guidelines, e.g. parking, septic, water and noise, required in use permits that protect the interests of rural residents and those should be sufficient to serve the entire rural community.

General Comments:

- General Plan and County Seal
  - Protect and enhance agricultural lands and the unique character of Sonoma County
  - Allow visitor serving uses to support agriculture
  - County Seal has Agriculture, Industry and Recreation
    - It does not say "preserve and protect rural residences" as a core value

Our vineyards and wineries are an economic driver in this county supporting governments through taxes, providing recreational activities for many visitors who also enjoy or forests, beaches, hiking and biking, and jobs for many of our residents. Rural residents take ag lands to build houses on multiacre lots and then landscape, add poos, and perhaps some hobby agriculture. But when the property comes up for sale, it will not revert to commercial agriculture.

## Staff Report

- County Ordinance Page 8 Paragraph 2: “The intent of the Winery Events Ordinance is to provide consistency and clarity to the use permit application evaluation process, reduce impacts to surrounding uses, protect agricultural lands and preserve rural character.” It seems preserve agricultural lands (and preserve agriculture by supporting agricultural production and sales to make farming in Sonoma County economically viable) is the top priority. And unless defined, rural character should not be listed.
- Unless Rural Character can be defined, I think references to Rural Character should be deleted throughout. As I read the General Plan, I think reference to Rural Character was concerned about processing or manufacturing facilities whose scale was not consistent with a rural landscape. Today’s wineries are smaller and smaller in scale and do not create traffic issues, excessive noise and generally blend well with the landscape. Page 6 last paragraph – “the draft Winery Ordinance implements the General Plan Agricultural Resources Element policies and programs to protect agricultural lands and the unique character of unincorporated communities”. I do not see that wording in Attachment 3. It seems to subjectively alter the General Plan.
- I am concerned that single consultant recommendations are inserted in ordinance language. Have those recommendations had any public input or review? The setback requirements seem arbitrary. How much noise is generated by a parking lot during Tasting Room Operating Hours? If it is an event at night with light standards with generators, then noise level at the property line of the nearest residence or facility should determine the setback or a noiseless light source alternative would be needed.
- Table 2: Remove parties from the tables. This implies many things to different people. Any Activity during normal Tasting Room Operating Hours to support sales is a legitimate and essential business activity today. Wine Club member recognition during Tasting Room Hours is an Activity. A Wine Club Recognition Dinner after 5:00 pm may be an event, but I could argue that customer retention today is a vital activity.
- Any Trade hosting should be an Activity. It is invitation only. Typically has a limited number or trade. A bus load of people would be the exception, not the rule. I say they should be hosted during normal business hours for the winery, i.e. 8:00 to 10:00. A Winemaker Dinner after 5:00 is typically 20 to 60 people by invitation or through ticket sales.

## Ordinance – Exhibit B:

- Expand list of Definitions as commented above RE: Events, Activities, Rural Character if definable, etc
- Replace “parties” with a more appropriate word for a sales Activity.
- #5 – Shall not rent to a third party. OK if the third party takes over the facility, but if it is an executive retreat who come for a staff meeting with food and wine during the day, this is a revenue source and an opportunity for new customers and wine sales. The winery staff hosts the Activity and no other alcohol is served.
- 6cs – Off-site parking. If needed for a large wine pickup Activity during normal Tasting Room Hours, this is counterproductive. It encourages on-road parking or other problems. Again, you

have parking standards and if exceeded, then the winery needs to mitigate to safely accommodate the visitors and neighbors. That may require off-site parking and visitor transportation.

- Setbacks seem arbitrary. There are noise guidelines at the lot line of the nearest neighbor and those limits need to be respected regardless of the setback.

I appreciate the opportunity to comment. It is essential that ambiguity of terms is removed so that applicants, the county and interested parties understand the rights and obligations under the ordinance so that use permit limitations are consistent for every applicant.

Thank you for your work in bringing this ordinance forward.

Sincerely,

Nick Frey

Balletto Vineyards

5700 Occidental Rd, Santa Rosa, CA 95401

**From:** [Marc Bommersbach](#)  
**To:** [Tennis Wick](#); [Scott Orr](#); [Brian Oh](#); [Georgia McDaniel](#)  
**Subject:** Winery Event Ordinance - Preserve Rural Sonoma County's (PRSC) comments  
**Date:** Friday, May 28, 2021 10:41:27 AM  
**Attachments:** [PRSC5 winery ordinance5-28PS.pdf](#)  
[Exhibit B PRSC redline markup 5-26.pdf](#)

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Tennis, Scott, Brian, Georgia,

Attached is a redline mark-up of the proposed ordinance and an accompanying letter explaining PRSC's comments. PRSC believes these comments are reasonable and balanced. They support Permit Sonoma's role in meeting the General Plan's objectives and policies regarding regulation of visitor uses in ag zones through its review of use permit applications using clear and specific standards.

The ordinance, with the modifications specified in these documents, in general, do not limit the wine industry from expanding or adapting to change business conditions.

I would like an opportunity to discuss a few provisions in the proposed ordinance that are confusing, and may need clarification prior to the hearing.

I appreciate your work to keep this effort moving along given workload from all of the other planning issues facing the County.

Regards,

Marc

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May 28, 2021

County of Sonoma  
Permit and Resource Management Department  
2550 Ventura Avenue  
Santa Rosa CA 95403

Attn: Tennis Wick, Scott Orr, Brian Oh, Georgia McDaniels

RE: Winery Event Ordinance Hearing, June 3, 2021,

Dear Director Wick,

Preserve Rural Sonoma County (PRSC) appreciates the opportunity to provide comments on the Winery Event Ordinance (red line mark-up attached). To meet the County's objective to avoid CEQA review for this Ordinance, the changes proposed in this letter and the attached red-line mark-up address the concerns of many rural residents who have been impacted by tasting rooms as they have morphed from drop in, stand-up tasting, to venues that offer seated wine and food pairing, meals, and potentially thousands of events.

PRSC's proposed changes will reduce land use conflicts in rural communities and provide clarity and more specificity to the County's winery permitting process by:

1. Revising definitions to close loopholes, remove inconsistencies and enhance enforcement.
2. Clarifying the ordinance to ensure any additional entitlements are conferred only under a modification to an existing use permit, with appropriate project-specific environmental review.
3. Adding siting criteria to address neighborhood compatibility and road safety issues, while preventing new areas of over-concentration.

These changes will not limit the wine industry's ability to grow and to adapt to future business conditions.

#### Background

The need for the Winery Event Ordinance grew out of concerns that the proliferation of tasting rooms and events in rural areas had gotten out of hand – resulting in significant public safety and environmental impacts. The objective of the Ordinance, as codified in the General Plan, is to create clear standards to manage winery hospitality and events on agricultural land and to address unauthorized promotional uses.



The Ordinance was never intended to expand or intensify visitor serving uses, however, efforts to reclassify what have been historically deemed as “events” to “tasting room activities,” and allowing “daily events”, would create a significant expansion of entitlements for promotional uses that have been included in hundreds of Use Permits approved over the last several decades.

PRSC appreciates the efforts, both past and present, of Permit Sonoma, Planning Commissioners and the Supervisors, to regulate hospitality uses through Use Permit-based project approvals that clearly specify the size, number, type, and time of day for all uses beyond normal drop-in or by appointment wine tasting. Citizens rely on these criteria and standards to maintain the peace, well-being, and safety of our roads and neighborhoods.

Loopholes in the “Definitions:” section should be closed. For example:

“Parties” are events – The County has long considered parties held for visitors (not employees) to be “events”. These include release/pick-up parties, wine club parties, harvest parties or other holiday or cultural parties. According to the dictionary, the definition of a party is: ***a social gathering of invited guests, typically involving eating, drinking, and entertainment.*** The proposed ordinance correctly defines release parties and wine club parties as Agricultural Promotional Events, however, pick-up parties and harvest parties, are listed as activities. This is clearly contradictory, confusing, and inconsistent with past practices. The definition of Ag-promotional events should include all four of the listed “parties” (or any other type of party held for visitors) as “events”. The rather vague and overly broad term “and other hospitality related activities” should be removed or clarified as to what hospitality uses are envisioned in the term “other”.

All visitor gatherings, including Wine Trade Activities, held after tasting room hours or where a meal is served should be considered to be an event - The draft ordinance recognizes the County’s long-standing policy that any gathering of visitors after tasting room hours or where a meal is served constitutes an event.

The after-hours limitation is an important provision, particularly for tasting rooms in rural areas. Long duration drinking past 5 pm - into the cocktail and dinner hour - has the potential to create both evening disruption in neighborhoods and road safety issues on lightly-patrolled rural roads. Excluding winemaker lunches, dinners and evening gatherings for the trade from the “after tasting room hours” limitation creates an entitlement to an unlimited number of these events. It also creates a loophole for enforcement, because there is no way to determine if a winemaker dinner was an event solely for the trade or just another promotional event. The impacts from events are the same regardless of what is on someone’s business card. Furthermore, given the County’s long history of limited enforcement, this is a clear opportunity for abuse.

If a winery’s business plan requires lunches and dinners and after-hours gatherings for the trade, these events can be included and evaluated in the event totals requested in the Use Permit application process.

A winery use permit should not allow events on parcels disassociated from the winery – Section D.6. defines Winery Events as events held at wineries and tasting rooms. However, it also makes the conflicting statements that they can “occur on site and/or in the area”. Besides contradicting the first statement, this phrase has the effect of allowing events to be held on parcels geographically disassociated from the winery. The reference to “or in the area” should be removed, otherwise hundreds more parcels, with no protection from a use permit, could be opened up for events. Wineries have the ability to request a zoning permit for a limited number of events in other areas.

Clarify that the Ordinance cannot confer additional entitlements to existing use permit holders

In order to support the County’s contention that the ordinance does not create an intensification of use that would require CEQA review for ordinance adoption, it should explicitly state that the provisions of this ordinance do not confer any visitation related entitlements over what is currently specified in writing and approved in a winery/tasting room’s current use permit.

In addition, it is our opinion that, without the changes proposed in this letter and the redlined mark-up the items listed below, the ordinance DOES in fact change to the County’s “current application review practices,” a finding that would trigger CEQA review for the ordinance due to the following changes:

1. Reclassification of gatherings after tasting-room hours, or with service of a meal, to Wine Trade Partners as “activities” instead of them being specified as “events”
2. The classification of some categories of parties as Winery Visitor Serving Activities and part of normal tasting room business operations
3. Modifying “noise setbacks” to allow a portion of the attenuation distance to be measured on adjacent properties, which is inconsistent with the General Plan Noise Element and the County’s current use permit review practice that measures noise element compliance at the property line.

To avoid the need for CEQA review, the ordinance must correct the above listed changes to “current application evaluation practices”, and clearly state that these definitional changes will only expand the uses that are specifically allowed under current use permits by permit modification.

Additional siting criteria need to be added

Siting criteria, such as minimum road width and parcel size, and a separation or density standard have always been included as part of the ordinance discussions. By setting Siting Criteria, the Ordinance would help the County to screen out projects that would likely be unable to meet mitigation requirements in the use permit process. This early project screening would protect local residents and reduce the risk to developers who may

otherwise spend considerable resources before coming up short in the decision process. It would also relieve staff, commissioners and the public from having to review contentious projects that have significant challenges for approval.

PRSC proposes the following four siting criteria that would address many of the issues raised in stakeholder discussions:

1. Access off minimum 18-ft. wide County roadway
2. 20-acre minimum parcel size for new wineries
3. Separation criteria of no more than two winery driveways in ½ mile
4. No outdoor amplified sound, except under a limited number of events per a zoning permit

Minimum 18 ft. roadway – This requirement was discussed in the Winery Working Group that included first responder personnel, and it was generally agreed between the community groups and wine industry that for, new winery applications, there should be sufficient access/egress for both visitors and emergency vehicles.

20-acre minimum parcel size – In agricultural areas the minimum zoning is generally 10 acres for DA and 20 acres for LEA and LIA zones. However, there are a number of parcels in all ag zones that are well below this threshold and that already have use permits. These small parcels present a challenge because they are usually surrounded by residences, are often located on rural lanes with poor access, and draw water from wells that are in close proximity to neighbors' wells. The 20-acre minimum is included in the Dry Creek guidelines and SVCAC guidelines. A 20-acre minimum standard would reduce many of the siting issues associated with smaller parcels. Permit Sonoma and the BZA are already starting to informally consider this criterion in project reviews.

Separation criteria – a separation criteria that allows a maximum two wineries in a ½ mile stretch of roadway would not only address the over-concentration of winery facilities in the identified areas of concentration, but it would lessen the potential for other areas in the County to become over concentrated over time. Both the City of Healdsburg and the City of Sonoma have enacted standards to address over-concentration of tasting rooms in their jurisdictions, and the Sonoma Valley CAC includes the proposed standard as well. The BZA has also now begun to consider density in project approvals.

No outdoor amplified sound –. In rural areas sound can travel significant distances - greater than the 1600-foot setback recommended by the sound consultant. Even with applicant-monitored "mitigation," amplified sound can be very disruptive to the neighborhood. This is why the vast majority of use permits prohibit outdoor amplified sound.

## Summary

With the changes proposed in this letter, including the revisions incorporated in the attached markup, the Ordinance would not restrict the expansion of visitor serving uses in ag-zones overall. The County would continue to issue use permits, and use permit modifications, with project-specific CEQA review. And the County would retain the right of discretionary review that limits development on specific parcels where environmental, safety and neighborhood compatibility, or cumulative impact issues cannot be addressed.

Ideally, an Ordinance with clear definitions and siting criteria would direct development into areas where it can have fewer impacts and, in order to be in compliance with CEQA, the ordinance would not allow current use permit holders to engage in new or unspecified visitor serving uses without first securing approval through a use permit modification.

Thank you

Preserve Rural Sonoma County

Attachment: Redline comments

**EXHIBIT “B”**  
**CHAPTER 26. SONOMA COUNTY ZONING REGULATIONS**  
**ARTICLE 18. AGRICULTURE AND RESOURCE-BASED USE STANDARDS**

**26-18-260 – Winery Standards**

- A. Purpose. This Section 26-18-260 provides a greater level of detail for the desired character of development in areas zoned LIA - Land Intensive Agriculture, LEA - Land Extensive Agriculture, and DA - Diverse Agriculture. For the areas zoned LIA, LEA, and DA, this Section 26-18-260 identifies procedures and criteria applicable to new or modified use permit applications for winery visitor serving activities and winery events. Current use permit holders shall be limited to the visitor and hospitality uses specifically allowed in their use permit conditions. The Standards in this division shall be referred to as “Winery Standards.”
- B. Applicable Areas. The provisions of this section apply to parcels zoned LIA – Land Intensive Agriculture, LEA-Land Extensive Agriculture, and DA -Diverse Agriculture. For split-zoned parcels, the provisions of this section apply to the portion of the parcel zoned for any of the agricultural zoning districts listed above.
- C. Local Advisory Guidelines. Citizen advisory councils/commissions established by the Board of Supervisors review projects subject to this section in accordance with their adopted local advisory guidelines, and make advisory recommendations to the Permit and Resource Management Department, Board of Zoning Adjustments, Planning Commission, and Board of Supervisors.
- D. Terms and phrases used in this section are defined as follows:
1. **Catering Kitchen** means a facility used for the preparation of food to be served in conjunction with winery visitor-serving activities and/or winery events. A catering kitchen associated with a winery and/or tasting room can include warming ovens, sinks and refrigeration, but no stove top, grill or range hood.
  2. **Commercial Kitchen** means a facility used for the preparation of food to be served in conjunction with winery visitor-serving activities and/or winery events. A commercial kitchen associated with a winery and/or tasting room can include counter space, sinks, microwave oven(s), warming oven(s), refrigeration, a stove or range, grill and an exhaust hood, and outdoor equipment such as pizza ovens or barbecues.
  3. **Food and Wine Pairing** means providing samples or tastes of site-grown or locally-grown food products that are showcased with different wines.
  4. **Rural Area** means any area not located within an urban service area designated on the General Plan Land Use Map.
  5. **Winery** means an agricultural processing facility that converts fruit into wine. Wineries may include crush areas, production rooms, case goods and barrel storage, tank rooms, warehouses, bottling lines, laboratories, administrative offices, tasting rooms, event space, commercial kitchen, and catering kitchen.
  6. **Winery Events** means events held at wineries and tasting rooms for the purpose of promoting and marketing agricultural products grown or processed in the County. Winery events are secondary and incidental to agricultural production activities occurring onsite ~~and/or in the area~~ and are consistent with General Plan Policy AR-

6d. There are two types of winery events: Agricultural Promotional Events and Industry-Wide Events.

7. **Agricultural Promotional Events** are directly related to public education, sales and promotion of agricultural products to consumers, including but not limited to: winemaker lunches, dinners, release/pick-up parties, harvest and wine club parties and similar events.
8. **Industry-Wide Events** are promotional activities sponsored by a recognized wine industry association that may involve multiple wineries and/or tasting rooms. Industry-wide events are held within a specified geographic area, during regular tasting room hours, and may last up to 3 consecutive days.
9. **Wine Trade Partners** means distributors, wine trade buyers, restaurant owners and their representatives, ~~winery or tasting room owner(s), winery employees, and tasting room employees.~~
10. **Winery Visitor Serving Activities** means visitor serving activities that are part of normal winery and wine tasting room business operations. There are two types of winery visitor-serving activities: Sales Activities and Wine Trade Activities.
11. **Sales Activities** are wine tasting, pickup parties, tours, seminars and other similar hospitality related activities that support the promotion of wine sales excluding winery events.
12. **Wine Trade Activities** are by-invitation meetings, seminars, harvest parties-wine tastings and similar activities excluding winery events, and attended only by wine trade partners and are not advertised to the consumer.

E. Operating Standards.

1. Winery Visitor Serving Activities. Winery visitor serving activities are considered part of normal winery and tasting room business operations. All winery visitor serving activities must be consistent with the tasting room hours of operation, maximum number of guests allowed, building occupancy limits, and operational requirements specified in the use permit.
2. Winery Events. Winery events must be consistent with the hours of operation, maximum number of event days, maximum number of guests allowed, building occupancy limits, and other operational requirements specified in the use permit.
3. Sizing, permissibility and other parameters of winery visitor serving activities and winery events, and maximum number of event days is based upon a variety of factors specific to the site and surrounding uses, including, but not limited to, septic capacity, available water supply, emergency access, availability of on-site parking, noise attenuation, increased risk of harm to people or property as a result of hazards, and the potential for negative cumulative effects related to noise, traffic, and water supplies.
4. Hours of Operation. The maximum hours of operation for winery visitor serving activities and winery events are specified below, unless further limited by the use permit.
  - a. Tasting Rooms. Regular business hours for tasting rooms are 10 am - 5 pm.

- b. Winery Visitor Serving Activities. The maximum hours of operation for winery visitor-serving activities are specified below by activity type.
  - (1) Sales Activities: 10 am – 5 pm.
  - (2) Wine Trade Activities: ~~8-10~~ am – ~~4-5~~ pm.
- c. Winery Events. The maximum hours of operation for events are specified below by event type.
  - (1) Agricultural Promotional Events may occur during the hours of 10 am – 10 pm, with all cleanup occurring no later than between ~~9:30-00~~ pm – 10 pm or as otherwise specified in Use Permit conditions.
  - (2) Industry-wide Events may occur during the hours of 10 am – 5 pm.
5. Wineries and tasting rooms shall not be rented out to third parties for events.
6. On-Site Parking. The following on-site parking is required for wineries and tasting rooms:
  - a. 1 parking space per 2.5 guests and 1 space per employee. The parking standard may be reduced in accordance with Article 86. - Parking Regulations Sec. 26-86-010 (i).
  - b. Use of on-site unimproved overflow parking areas or shuttling may be allowed to accommodate winery events, if specified in the use permit.
  - c. Overflow parking and shuttling shall not be used to accommodate parking for winery visitor serving activities.
  - d. No parking is permitted along any public or private roadways or on shared vineyard roads.
7. Food Service. Food service is allowed as specified below.
  - a. All food service must be designed to promote and enhance marketing of wine. Food service shall be secondary and incidental to agricultural production, wine sales and education.
  - b. Operating the food service area as a restaurant, café, delicatessen or any food service offering cooked-to-order food is prohibited.
  - ~~e.~~ Food and wine pairings featuring local foods and food products is allowed in conjunction with winery visitor serving activities and winery events ~~.~~
  - ~~e.c.~~ Prepared meals featuring local foods and food products is allowed in conjunction with ~~wine trade activities and~~ winery events.

e.d. Retail sales of pre-packaged food in conjunction with wine tasting is allowed subject to the following limitations:

- (1) Retail sale of pre-packaged food featuring local foods and food products is allowed during the regular business hours identified in the use permit.
- (2) Retail sale of pre-packaged food is allowed for on-site consumption only. Outdoor seating areas may be allowed for use as outdoor picnic areas.
- (3) Indoor seating area or table service in conjunction with retail sales of pre-packaged food is prohibited.
- (4) Off-site signs advertising retail sales of pre-packaged food are prohibited.

8. Event Coordination and Traffic Management.

a. On-Site Coordinator. An on-site coordinator is required to address complaints about winery events both during and following an event. The on-site Coordinator shall:

- (1) Ensure that the winery's website prominently lists a telephone number for the public to make event-related complaints; and
- (2) Send an annual notice to owners and occupants of lots within 300 feet of the winery/tasting room lot boundaries to provide the "complaint hotline" telephone number.

b. Traffic Management Plan. Traffic management and parking plans are required to address the maximum number of people visiting during winery visitor serving activities and winery events. For events exceeding 100 participants and for events that require use of overflow parking, the traffic management plan shall include the following:

- (1) Provisions for event coordination to avoid local traffic delays.
- (2) Parking attendants for each day of the event.
- (3) A shuttle plan, if shuttling is requested, to support each day of the event. A convenient and secure "park and ride" area must be provided.
- (4) A plan for on-site parking requirements and queuing of traffic.
- (5) Enforcement of the on-street parking restrictions.
- (6) Subsequent changes to the approved Traffic Management Plan shall be submitted in advance to the Permit and Resource Management Department.
- ~~(6)~~

9. Noise Attenuation Setbacks. Noise is attenuated by distance from the noise source. To ensure compliance with the Sonoma County General Plan Noise Element thresholds for maximum allowable exterior noise exposure levels, winery visitor serving activities and winery events shall meet the required setbacks provided in Table 18-2 below:



Table 18-2: Required Noise Attenuation Setbacks

Noise generating land use	Setback measured from the exterior property line of any adjacent noise sensitive land use
Parking lots	450 feet
Outdoor areas involving groups of people or non-amplified music (i.e. acoustic)	625 feet
Outdoor areas involving amplified music, or loud instruments such as brass instruments, horns, or drums	1,600 feet

Exceptions to the setbacks listed in Table 18-2 above may be allowed when a project-specific noise study prepared in accordance with the Permit and Resource Management Department Guidelines for the Preparation of Noise Analysis determines the project will comply with the Sonoma County General Plan Noise Element due to intervening structures or natural features, ~~available open land on noise sensitive parcels~~, or by incorporating noise mitigation measures.

F. Siting Standards:

1. Parcels for new winery and tasting room development shall be at least 20 acres in size
2. New winery and tasting room project locations cannot result in more than two facilities within a ½ mile distance.
3. Project access shall be off public roads with a minimum 18-foot width
4. Outdoor amplified sound is prohibited

# Sonoma County Bicycle & Pedestrian Advisory Committee


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Christopher Woodcock (Chair) 1<sup>st</sup> District  
Joe Morgan 2<sup>nd</sup> District  
Matt Frazier 2<sup>nd</sup> District (Alt.)  
Vincent Hoagland 3<sup>rd</sup> District  
Bob Stender 3<sup>rd</sup> District (Alt.)  
Amy Loukonen (Vice-Chair) 4<sup>th</sup> District  
Jennifer Neeley 5<sup>th</sup> District  
Brian Bauer 5<sup>th</sup> District (Alt.)



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## MEMORANDUM

**Date:** May 28, 2021  
**To:** Georgia McDaniel, Permit Sonoma  
**From:** Steven Schmitz, SCBPAC Staff   
**Re:** SCBPAC Comments on Draft Winery Events Ordinance

On behalf of the Sonoma County Bicycle and Pedestrian Advisory Committee (SCBPAC), thank you for the opportunity to comment on the Draft Winery Events Ordinance. Comments are provided below. Should you have any questions, please contact Mark Hansen or me at 585-7516.

In regards to 26-18-260 – Winery Standards Section *E. Operating Standards* part 8. *Event Coordination and Traffic Management*, the committee recommends working with the Transportation and Public Works Department on making the following additions and changes to sub-section *b. Traffic Management Plan*:

1. Lower the threshold for the number of participants at events that would require a traffic management plan.
2. Require that signs, event staff, and queuing vehicles do not obstruct or encroach on any bicycle/pedestrian facilities present along adjacent roadways.
3. Require private shuttles to perform all pick-ups and drop-offs on-site at the events and not on adjacent roadways.
4. Require traffic control attendants for each day of the event.
5. Require bicycle/pedestrian safety signs at events along adjacent roadways.

**Cc:** Chris Woodcock, SCBPAC Chair  
Ken Tam, Regional Parks  
Vincenzo Corazza, Transportation and Public Works  
Gary Helfrich, Permit Sonoma  
Mark Hansen, Sonoma County Transit

**From:** [Michael Haney](#)  
**To:** [PRMD-WineryEvents](#)  
**Subject:** Fwd: Permit Sonoma Comments  
**Date:** Friday, May 28, 2021 2:03:39 PM

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Good Afternoon:

Sonoma County Vintners (SCV) appreciates the work and the staff report produced by Permit Sonoma regarding the proposed winery events ordinance and is encouraged to see this important issue being addressed and moved forward. While the report does assist in addressing winery events and business activities, we feel some additional emphasis and clarification on a few items are needed.

As SCV has presented over the past few years, it is important to create clear definitions of winery events vs winery business activities. SCV has provided these specific proposed definitions to Permit Sonoma.

In addition, the two following areas should also be addressed and or adjusted:

1. The Staff report seems to not accurately present just how the county historically treated promotional activities.
2. The proposed ordinance also does not address or provide a path for events and business activities at existing wineries.

For the first:

The background in the staff report states "Prior to 1989, the zoning code allowed agricultural cultivation by right and retail sales and tasting rooms with a use permit, but did not allow events or promotional activities."

**This statement does not represent the historical application of the zoning ordinance.**

A more accurate background notes that Ordinance 230, adopted on November 8, 1945 was the county's first zoning ordinance. Wineries and tasting rooms existing prior to that date.

- Ordinance 230 allowed cultivation by right, but required a use permit for an "agricultural processing plant" which addressed commercial packing or canning of agricultural products.
- In the late 1960's or early 1970's, staff determined wineries fell into this category and began requiring use permits for wineries and tasting rooms.
- Use permits issued in this era were generally vague and typically consisted of a few conditions. Events and promotional activities took place during this time such as non-profit, social, public service and political fund-raising events. These activities were considered inclusive of a lawful tasting room.
- The 1989 General Plan recognized the distinction between winery and tasting room.
  - The 1990 zoning code update reflected this distinction and provided a definition for a tasting room as a location where items processed within the county may be tasted and sold. This update specifically named wineries as agricultural processing and explicitly allowed retail sales of items processed on premises with a use permit.
  - Events continued to take place at wineries and tasting rooms. Wineries were allowed to modify their use permits for expanded production and increasing facilities, but were not required to address events as the county considered subordinate marketing activities and events inclusive of a tasting room.
  - In the mid 1990's, the county began to develop policies to address varied and expanding wine marketing activities. Those policies included wedding, food services and

participation in industry wide events.

- Around 1995, the county began to condition event activities via the use permit process by addressing the number of events.
  - Since that time, events have been consistently addressed and conditioned in the use permit process.
  - Before this time, the county considered business activities and events integral to tasting rooms as long as they remained subordinate to the primary agricultural use.
  - The vast majority of use permits contain no explicit approval to participate in industry wide events.
- Based on this historical and changing application of zoning regulations, the statement in the staff report that all events and activities prior to 1989 were not allowed is inaccurate.

#2: The proposed ordinance also does not address or provide a path for events and business activities at existing wineries.

- As recently as 10 years ago Permit Sonoma considered participation in industry wide events inclusive of existing permits, as long as the winery had a use permit approved for public tasting and participation in the event complied with the existing use permit for hours of operation and operational conditions.

Consideration should be given that any draft event ordinance should address a process to recognize those wineries with historical events and business activities.

Thank you again for your time!

Sincerely,

Michael Haney  
Executive Director  
Sonoma County Vintners  
Sonoma County Vintners Foundation  
400 Aviation Blvd. Suite 500  
Santa Rosa, CA 95403

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**From:** Padi Selwyn <padi.selwyn10@gmail.com>

**Sent:** Saturday, May 29, 2021 8:56 AM

**To:** Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; James Gore <James.Gore@sonoma-county.org>; Chris Coursey <Chris.Coursey@sonoma-county.org>

**Subject:** PRSC's comments re: Winery Event Ordinance

Dear Supervisors,

Attached is input regarding the Winery Event Ordinance draft with additional specific comments in the redlined document attached.

Our group has been involved in rigorously studying these issues and participating in the Winery Working Group as well as numerous CAC's for the past several years. Our input is based on well researched and long discussed issues with our winery neighbors.

Thank you for your consideration.

Padi Selwyn  
(707) 569-6876

**PRESERVE RURAL SONOMA COUNTY**

*Visit our website at - <http://www.preserveruralsonomacounty.org>*

*Like us on Facebook - <https://www.facebook.com/preserveruralsonomacountyg>*

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**From:** [Janus MATTHES](#)  
**To:** [PRMD-WineryEvents](#); [greg99pole@gmail.com](mailto:greg99pole@gmail.com); [Jacquelynnne Ocana](#); [p.davis479@gmail.com](mailto:p.davis479@gmail.com); [Todd Tamura](#); [Kevin.Deas@deasproperties.com](mailto:Kevin.Deas@deasproperties.com)  
**Subject:** Winery Events hearing  
**Date:** Monday, May 31, 2021 5:30:24 PM  
**Attachments:** [WWW winery events May 2021.docx](#)

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## EXTERNAL

[www.winewaterwatch.org](http://www.winewaterwatch.org)

May 28, 2021

PRMD-WineryEvents@sonoma-county.org

To: Permit Sonoma & Planning Commissioners

Greg Carr - [greg99pole@gmail.com](mailto:greg99pole@gmail.com)

Jaquelynnne Ocana - [jacquelynnne.ocana@sonoma-county.org](mailto:jacquelynnne.ocana@sonoma-county.org)

Pam Davis - [p.davis479@gmail.com](mailto:p.davis479@gmail.com)

Todd Tamura - [todd.tamura@sonoma-county.org](mailto:todd.tamura@sonoma-county.org)

Kevin Deas - [Kevin.Deas@deasproperties.com](mailto:Kevin.Deas@deasproperties.com)

RE: Winery Event Ordinance

Wine and Water Watch is a local organization of over 300 citizens concerned with the overdevelopment of the wine tourism industry. We promote ethical land and water use. We oppose the industrialization of agricultural lands not growing food, medicine, fiber or silage especially when dwindling resources and climate change is making large impacts to our lives.

We continue to believe strict regulations on events both size, number, definition and timing with high traffic events should be created. The fact is the County already has such a policy and it should be included in the ordinance. Weddings, parties, and business meetings are not agriculture promotions but rather corporate event productions and not ag. Up to date traffic studies, no more than 2 years old, need to be created to map out potential problems due to binge tourism. We are tired of "right turn only" season that this inflated industry creates is both a safety issue and a quality-of-life issue.

Winery event expansion is nothing more than tourism promotion. More tourism via winery events is not an economic cure all. The recent Economic Development Plan, pre-pandemic clearly shows that tourism is not much of a vital economic generator (6.5% according to the 2021 Economic outlook report by Robert Eyster). Tourism should be supportive to local communities and not dislocate the local population with traditionally low wages, unaffordable housing due to investors, sacrificing our local mom-and-pop businesses that service resident needs and require more taxes to fix the overburdened infrastructure. No more wine industry expansion. We urge the planners to take this into consideration when viewing the regulations. Loopholes must be closed to stop this barely controlled expansion which creates more traffic, noise, drunk drivers and more low wage jobs that make homelessness and inequality even more extreme. With expanded events comes more homes being lost to vacation rentals. **There is a reason Sonoma County is number 3 in homelessness in the entire country.** Regulation of this bloated industry is geared towards corporate interests that come to this county for resources and profit that leave the county. We all supported small family run wineries which are now struggling



to compete with large national corporations.

We suggest that if the wine industry needs more events to survive that as a community, they work together to build a large center that can cater to all wineries and events and has the infrastructure to support the added pressure to our community. The wine industry should be paying for this not more tax increases and aggravation born by residents. Luther Burbank Center type of property close to a major thoroughfare should be the goal not scattered winery events all over the county. This is being done by Central California communities and working successfully as they are located in areas where local businesses can thrive instead of just the wine industry.

Agriculture in this county has had plenty of changes over the years. From potatoes, to hops, prunes, peaches, apples, poultry, pears, hay, dairy, cattle and sheep. Dairy and cattle remain as do some poultry business but pared down into a realistic size industry. **With diminished sales, wine grape glut and lowered worldwide demand, changing tastes and new online marketing, time for this industry to adjust or die.** Those eras did not have the same issues we face today: climate change impacts that may cause our own extinction, scarce water, changing cultural tastes, unaffordable land, social inequality to name a few .

**A serious discussion and studies need to be made on the ever-expanding wine industry impacts that are adding considerable amounts of GHG worsening climate change in search of customers, depleting our aquifers and the onslaught of chemical based ag further polluting the water we have. We have paid the price for their endless assaults on our environment. Time for them to make the changes that benefit the community as we all have already sacrificed way too much for their pursuit of profit.**

All events must be closed by 5pm, no tasting on disconnected parcels, roadways must be legal (18 feet), no events within a half mile and recent traffic studies to truly see the impacts.

A full Cumulative Impact Report should be made before any changes to the winery event regulations and climate change must be addressed. Added events equals more greenhouse gases by additional vehicle miles traveled is yet to even be broached. The cannabis industry will get a cumulative impact report, why not this industry? As we all suffer through the megadrought, where is the extra water coming from to flush toilets, clean glasses and cater to out of towners? Ag already uses 80% of our shared water resources. More lost "ag" lands to create additional parking lots and visitor centers, is not ag.

We urge the commissioners to close the loopholes and protect the people who actually live here. Our organization looks forward to action on this matter *that reflects the public not what the wine industry wants*. We need strict rules so everyone knows what is expected. Thank you for your consideration.

Sincerely,

Wine & Water Watch Board

Janus Matthes, Deb Preston, Merrilyn Joyce, Pamela Singer, Dr. Shepherd Bliss, Charlotte Williams, Sarah Ryan, Tom Conlon, Judith Joinville



[www.winewaterwatch.org](http://www.winewaterwatch.org)

May 28, 2021

PRMD-WineryEvents@sonoma-county.org

To: Permit Sonoma & Planning Commissioners

Greg Carr - [greg99pole@gmail.com](mailto:greg99pole@gmail.com)

Jaquelynn Ocana - [jaquelynn.ocana@sonoma-county.org](mailto:jaquelynn.ocana@sonoma-county.org)

Pam Davis - [p.davis479@gmail.com](mailto:p.davis479@gmail.com)

Todd Tamura - [todd.tamura@sonoma-county.org](mailto:todd.tamura@sonoma-county.org)

Kevin Deas - [Kevin.Deas@deasproperties.com](mailto:Kevin.Deas@deasproperties.com)

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Loopholes must be closed to stop this barely controlled expansion which creates more traffic, noise, drunk drivers and more low wage jobs that make homelessness and inequality even more extreme . With expanded events comes more homes being lost to vacation rentals. **There is a reason Sonoma County is number 3 in homelessness in the entire country.** Regulation of this bloated industry is geared towards corporate interests that come to this county for resources and profit that leave the county. We all supported small family run wineries which are now struggling to compete with large national corporations.

We suggest that if the wine industry needs more events to survive that as a community, they work together to build a large center that can cater to all wineries and events and has the infrastructure to support the added pressure to our community. The wine industry should be paying for this not more tax increases and aggravation born by residents. Luther Burbank Center type of property close to a major thoroughfare should be the goal not scattered winery events all over the county. This is being done by Central California communities and working successfully as they are located in areas where local businesses can thrive instead of just the wine industry.

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**A serious discussion and studies need to be made on the ever-expanding wine industry impacts that are adding considerable amounts of GHG worsening climate change in search of customers, depleting our aquifers and the onslaught of chemical based ag further polluting the water we have. We have paid the price for their endless assaults on our environment. Time for them to make the changes that benefit the community as we all have already sacrificed way too much for their pursuit of profit.**

All events must be closed by 5pm, no tasting on disconnected parcels, roadways must be legal (18 feet), no events within a half mile and recent traffic studies to truly see the impacts.

A full Cumulative Impact Report should be made before any changes to the winery event regulations and climate change must be addressed. Added events equals more greenhouse gases by additional vehicle miles traveled is yet to even be broached. The cannabis industry will get a cumulative impact report, why not this industry? As we all suffer through the megadrought, where is the extra water coming from to flush toilets, clean glasses and cater to out of towners? Ag already uses 80% of our shared water resources. More lost "ag" lands to create additional parking lots and visitor centers, is not ag.

We urge the commissioners to close the loopholes and protect the people who actually live here. Our organization looks forward to action on this matter *that reflects the public not what the wine industry wants*. We need strict rules so everyone knows what is expected. Thank you for your consideration.

Sincerely,

Wine & Water Watch Board

Janus Matthes, Deb Preston, Merrilyn Joyce, Pamela Singer, Dr. Shepherd Bliss, Charlotte Williams, Sarah Ryan, Tom Conlon, Judith Joinville



May 31, 2021

County of Sonoma

Permit Sonoma

2550 Ventura Avenue

Santa Rosa, Ca. 95403

Attn: Sonoma County Planning Commissioners

Re: Winery Event Ordinance Hearing June 3, 2021

Dear Commissioners,

Valley of The Moon Alliance (VOTMA) has been concerned about the Winery Events issue since 2004 when we conducted a study called “The Potential for Events Facilities on Agricultural Land in the Sonoma Valley – Choices for the future.” It examines the potential, under present zoning, for a growing number of visitor-serving and event facilities on Agricultural lands in Sonoma Valley. Just looking at the valley floor from Kenwood to South Valley there was a potential of 400 facilities. That potential has not changed. What has changed is the marketing of wine and the apparent need for ‘direct to consumers’ contact to sell wine. This is where visitor-serving uses and events have exploded in the last 10 years. The imagination was the only limit. More visitors mean more impacts from noise, traffic and congestion to the rural neighborhoods. Choices for the future have been kicked down the road for too long. We are finally getting a first look at a county ordinance with some resource-based use standards. We appreciate this long-awaited draft ordinance, but feel there may need to be some modifications to achieve the intended goals of protecting the primacy of agricultural production on agriculturally zoned lands, providing clarity on standards for visitor services to the wine industry as well as limiting the impacts to rural roads and neighborhoods.

We agree with the detailed comments and suggested changes submitted by Preserve Rural Sonoma County (PRSC) on May 26, 2021, including the redlined draft ordinance. Some of these changes include revising definitions to close loopholes, such as Agricultural Promotional Events and Winery Visitor Serving Activities. Both are intended to sell wine to visitors so what are the differences? Wine tasting

and sales should be limited by the tasting room hours, like a retail store with hours of operation. If marketing to visitors or trade partners is done after tasting room hours or involves a sit-down meal, it should be considered an event. Perhaps a maximum number of visitors, say 30, could be established to minimize the impacts of these visitors if the site can accommodate this number with on-site parking, septic capacity and emergency access.

Another important point to emphasize is that this ordinance should not give additional entitlements to wineries with existing use permits. Unless a winery with an existing use permit reapply to modify their use permit using this ordinance, they are bound by their existing use permit terms. The current evolving trends in marketing may not have been included in the descriptive use permit. It means what is allowed is described in the use permit, if it is not described, it is not allowed. In order to support the County's contention that the ordinance does not create an intensification of use that would require CEQA review for ordinance adoption, it should explicitly state that the provisions of this ordinance do not confer any visitation related entitlements over what is currently specified in writing and approved in a winery/tasting room's current use permit.

Thoughtful consideration of wine industry marketing need to be spelled out by the county ordinance in order to balance the projected needs of the wine industry with the protection of agricultural zoned lands for the production of crops and not visitor-serving uses which are presently to be "incidental and secondary" to agriculture production in Sonoma County.

Thank you for your thoughtful consideration.

Kathy Pons

Valley of The Moon Alliance