



March 13, 2020

Sonoma County Board of Supervisors

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Re: ORD16-0001 Winery Events Local Area Guidelines and Ordinance Update

Dear Sonoma County Supervisors,

In 2004 Valley of the Moon Alliance (VOTMA) conducted a yearlong study, “The Potential for Events Facilities on Agricultural Land in Sonoma Valley – Choices for the Future.” Our concerns are still the same, 1) the **growing number of event facilities** on agriculturally zoned land, 2) the **potential for concentrations** of such facilities along the highways and county roads, along with the traffic and safety issues associated with this, 3) the continuing **erosion of the rural character** of Sonoma Valley with large scale development, through the cumulative effects of noise (sometimes amplified) from event facilities, the cumulative effects of lights on the night sky, and the negative effects of event facility development on hillsides and viewsheds, and 4) the **continuing lack of official coordination, monitoring or enforcement** of the frequency and size of events throughout the Sonoma Valley .

The Study Area consisted of 792 parcels that lay in the agriculturally zoned area of Sonoma Valley. With the present “minimum lot size” of these parcels there could be a total of 974 legal parcels which could be developed. In 2004, 38 parcels already contained event facilities and 362 of the potential 974 parcels were evaluated with a “high” to “very high” potential for development. With a maximum build out

scenario there could be 400 parcels with event facilities on agriculturally zoned lands within Sonoma Valley.

In 2004, there were 33 parcels on agriculturally zoned parcels with permits to hold a total of 705 promotional events, bringing 115,500 visitors to the valley each year.

In 2014 there was an update to the study. Over the 10-year period, 298 newly permitted events allowed another 55,300 visitors to the study area each year; a 47% increase.

To see the whole study and the update done in 2014 go to:

https://www.votma.org/files/VOTMA_2004_potential_event_study.pdf

We support the Staff's recommendation that Permit Sonoma (PS) prepare a county wide ordinance, to prevent new areas of concentration, and adopt more protective guidelines that reduce the detrimental impacts of potential over concentration. A county wide **ordinance needs to have enforceable definitions, protective standards and criteria** to prevent new areas of concentration in agricultural or resource zones. In addition, we support the adoption of **enforceable guidelines** for Sonoma Valley, Westside Road and Dry Creek; not unenforceable "guidelines" to be used only for advisory recommendations for new or modified winery applications. The County-wide Ordinance must have reporting, monitoring and enforcement provisions because within the Sonoma Valley Guidelines there is no enforcement.

Another concern is that the draft Sonoma Valley Guidelines can hardly be considered the community's consensus since it is still a draft and there has been no other public comment period.

We also support the county compliance to Sonoma County General Plan Policy AR-6g: *"Define in the Development Code compatible visitor serving uses such as tasting rooms, sales and promotion of products grown or processed in the County, educational activities and tours, **incidental** sales of items related to local area agricultural products, and promotional events which support and are **incidental** to local agricultural production, and define their permissible sizes and intensities."*

We have emboldened the word "incidental" because it is referred to in Objective AR-6.1 where the last sentence ends with **"but shall be secondary and incidental to agricultural production."** This is repeated in Policy AR-6a and Policy Ar-6d. An ordinance in the Development Code could define the visitor serving uses and their permissible sizes and intensities, so the events remain secondary and incidental to production.

If the Ordinance definitions and associated local area guidelines increase visitation levels, and their associated impacts, through new types of activities or expanded rights to private events that "run with the land in perpetuity" through being specified in the Use Permit, then a full cumulative impact CEQA analysis would be required. There have already **been twice as many winery /tasting rooms approved by the County in 2014 as were evaluated in the 2008 General Plan Environment Impact Report.** We continue to be concerned that the County continues to issue highly impactful Discretionary Use Permits absent any cumulative impact analyses.

The County has also failed to implement a visitor tracking and event coordination program as required in Policy AR-6d. These policies are meant to reduce the “potential cumulative impacts resulting from a concentration of visitor-serving uses.” Since the mid-1990s the County has included a condition of approval (COA) in all Use Permits for wineries within Sonoma Valley that requires the winery to comply with any event coordination program. **The pilot program to calendar events was not successful;** however I have heard that there is a county calendar for events that need a cultural/special event permit.

Certain definitions being considered by the County will actually increase entitlements to hospitality uses with higher levels of visitation. Daily food pairings and trade meetings and events are effectively exempt from review. Marketing plans and visitor tracking at wineries is needed. How many visitors come during the day to the tasting rooms and how many come for events after tasting room hours. On a business level this information is available and could provide a more accurate analysis as to what is the real picture of visitor serving uses happening on agricultural or resource zoned lands.

Within the GHD Sonoma Valley Capacity Threshold Study, recommendation #1 is “Safe driveway access for all wineries needs to be maintained.” They go on to suggest “records of past attendance as well as forecasted visitor attendance should be required at time of application and/or renewal.” Should forecast attendance increase, existing driveway access should be re-evaluated.

We support the Staff’s recommendation that a zoning permit be required for industry-wide events. GHD’s recommendation #6 also suggests that the community be notified about upcoming Industry wide events so they can plan for the increase in visitors and impacts in travel within their community.

A county wide process to collect data from wineries about visitor tracking and events is needed and would be helpful to all in evaluating over use of visitor serving uses on Agricultural zoned lands.

We trust the Board of Supervisors will authorize an Ordinance that includes visitor tracking to prevent new areas of concentration and reduce the detrimental impacts of over concentration.

Please consider the importance of a county wide ordinance to protect our Agricultural and Resource zoned lands, as well as adopting guidelines for the areas of concentration that are already dealing with the cumulative impacts of detrimental concentration. Thank you.

Sincerely,

Kathy Pons, President

Valley of The Moon Alliance

Board of Directors