April \_\_, 2022

County of Sonoma

Permit and Resource Management Departments

2550 Ventura Avenue

Santa Rosa CA 95403

Attn: Joshua Miranda

RE: UPE22-0021 - Rochioli Winery's Proposed Micro-Brewery, 6192 Westside Rd., Healdsburg

Dear Mr. Miranda,

The community groups listed in this letter submit the following comments regarding the above referenced application, which requests a modification to an existing winery use permit to allow for the addition of a micro-brewery.

This application conflicts with both that Zoning Code and the General Plan, and approval of a micro-brewery at a winery would set a harmful precedent for the hundreds of wineries and tasting rooms currently permitted on ag-zoned lands.

We respectfully request that Permit Sonoma recommend denial of this use permit application.

Violation of Zoning Code

The brewing is the agricultural processing of grain to beer. Agricultural processing is a permitted use under the zoning code with a use permit for LIA zoned lands (e.g. a winery converting grapes to wine), however, Sec. 26-18-030. - Agricultural Processing definition limits such agricultural processing to “processing of agricultural products of a type grown or produced primarily on site or in the local area”. Grain is not an agricultural product that is grown or produced on site or in the local area. Consequently, the proposed use is not a permitted use under the zoning code.

Conflicts with Ag Element of General Plan

Ag Element of the General Plan outlines the policies to regulate the location and intensity of agricultural related support services such as processing in agricultural areas. Section 2.5 states:

*“…..the apparent increase in the reliance of County processing facilities upon raw agricultural products imported from outside Sonoma County highlights the importance of demonstrating “connection” to local production in order to avoid County agricultural lands becoming defacto “industrial lands.”*

The General Plan does allow for processing facilities in ag zones, but only for processing of local agricultural production. General Plan Policy AR-5a states:

*“Provide for facilities that process agricultural products in all three agricultural land use categories only where processing supports and is proportional to agricultural production on site or in the local area. \*”*

Clearly since grain is not produced on-site or in the local area, there is no connection between the local production and the proposed processing. Therefore, approval of a processing facility for grain – a brewery – would conflict the protections in the General Plan**.**

Set Harmful Precedent

In addition to the proposed use conflicting with the Zoning Code and the General Plan, consideration of a brewery at a winery would have significant adverse policy implications. The County currently has nearly 500 winery/tasting room use permits, with most located on ag zoned lands. If the County is now considering approval of a brewery at an existing winery, it is likely to encourage many more similar applications. In addition, many micro-breweries in Sonoma County are associated with brewpubs where beer is consumed and food is served. While the application states that is it not requesting tasting “at this time”, the implication is that at the applicant would request approval for tasting in the future. There is a real possibility that locating micro-breweries at wineries would morph into brewpubs in ag zones.

Given the serious zoning and general plan conflicts, combined with the precedent and policy issues associated with this application, Permit Sonoma should recommend denial of this application.

Thank you