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Mr. Farace,

I want to thank you for your past efforts to support the San Diego growing wine-grape industry, and appreciate being able to provide input from an operational standpoint on the proposed changes to Tiered Winery Ordinance. We've been making wine since 2005, installed our first vineyard on our property in 2006, and have been expanding our operations over the past 8 years, with ideas for our entire 10 acres. As a former Naval Officer, and current health care executive, I understand the importance of compliance. Micole and I have launched our own small businesses based on the highest values and are making award winning wines, contributing to the local economy and sustainable agriculture.

After reading the proposed changes, it is our strong request that the current Boutique Winery Ordinance be left as is to allow our new industry to grow, rather than add additional requirements, which in my review, make this the most restrictive grape-growing, farming, and wine-making ordinance in California.

Revisions to the ordinance are not reasonable standards and procedures – Federal and California law allow the importing of wine produced off-site for reselling/bottling for sale at a

bonded winery with the same California 02 license. Federal law outlines how this is identified on the Wine Label, and Wine labels may contain several types of geographic designations of origin, which inform the consumer as to the origin of the grapes. Adding restrictions which prohibit sales of wine produced off-site, require that prior to the production of any wine the winery have a valid permit and bond, and eliminating the 'by-right' zoning allowances in the original ordinance will destroy our new industry. Requiring boutique wineries, which by definition and practice, are typically very small, family run-operations, to 'be permitted and constructed in compliance with the applicable commercial building codes, including the requirements of the American Disabilities Act," is cost-prohibitive. The majority of the wineries in San Diego County are located in residential structures, i.e. home garages and barns, this is a common practice, with a French term, garagistes refers to a group of innovative winemakers in the Bordeaux region, producing "Vins de garage", "Garage wine". Paso Robles has an annual festival, celebrating Garagites. Eliminating the by-right zoning previously granted to agricultural properties zoned A70 and A72 would add expensive and unnecessary building code restrictions, making it too costly to open. The first step in promoting local agriculture is to make sure it is economically viable.

Disallowing the common practice of bringing in varietals not available in the region restricts business choice, yes, some wineries choose to only offer "estate" wines, but this should be a business decision, not a bureaucratic restriction. For example, Chardonnay is the number one selling wine in California and is often requested by consumers, with several San Diego wineries sourcing a well-made Chardonnay to supplement the tasting menu, a common practice allowed by State and Federal law. Another common industry practice is a new winery will use a wine-maker or facility off-site to make the wine with their fruit, then bring back the finished wine on-site under a bond-to-bond transfer. As more tasting rooms open there will be less and less San Diego County grapes available for sale, yet the proposed changes restrict this even further, prohibiting the sale of wines made off premises.

Boutique wines are costly to make, necessitating a good consumer experience to encourage sales; otherwise, why would someone spend \$20 - \$40 for a bottle of wine, when they can purchase something similar at the grocery store for under \$10. Part of the consumer experience includes on-site events, which may include amplified music, on-site food preparation, and farm stays, the proposed changes to the ordinance eliminate these business choices. The average sized farm in our County is less than 10 acres. Agritourism is a form of niche tourism

that is considered a growth industry in many parts of California, including the wine industry. Quoting the Small Farm Center at the University of California, "Agricultural tourism or agritourism, is one alternative for improving the incomes and potential economic viability of small farms and rural communities. Some forms of agritourism enterprises are well developed in California, including fairs and festivals. Other possibilities still offer potential for development." The proposed changes to the San Diego County Tiered Winery Ordinance are not agritourism or consumer friendly, and instead favor the urban wineries, which do not face the same requirements. Should the ordinance go forward as written, many fear the end result will be the death of the San Diego Boutique Wineries, not their potential growth and agricultural commitment.

The ordinance, as is, supports the growth of our premium boutique wineries, which in turn, support our local economy, bring jobs to the rural communities, encourage sustainability, and are increasing in the contribution to the overall San Diego economy. I urge you to leave the ordinance as is and allow the farms and wineries of rural San Diego the opportunity to grow, rather than face mounting restrictions that would make our future as wine-grape growers and wine-makers unsustainable.

Sincerely,

Teri

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Editor in Chief, Ramona Valley Wine Region Magazine

cc. Micole Moore; Co-owner and COO

Ramona Valley Vineyard Association (RVVA)

Eric Larson, Executive Director, San Diego Farm Bureau