

7 October 2019

COW 10/7/19 Public Comment  
 SUSAN BOUNDY SANDERS

Issue	Rationale	Location in CM Balducci's S1 of 9/16/2019
Remove Overlay A	<p>Please remove Overlay A from the ordinance.</p> <p>Overlay A is urban uses—drinking establishments—on Rural land; it violates the letter and spirit of the GMA and CPPs. By itself, creating the overlay rewards violators and invites more to join them. More importantly, creating the overlay clearly signals the County's softening resolve, and puts all land outside the UGB at risk for speculation.</p>	<p>Pages 113-114, Sections 27-28, Lines 1968-2098</p>
<p>Definitions and permitted uses:            Make them mutually consistent, impose meaningful steps-of-production threshold to qualify as a winery, and require product sold on-site to be produced on-site.</p>	<p>Please fix several problems with definitions and permitted uses, and the correspondence between them.</p> <p><b>Consistency:</b> <u>Definitions</u> call for only <u>one</u> production step; <u>permitted uses</u> call for <u>two</u> production steps. These should be resolved to be mutually consistent.</p> <p><b>Raise production steps requirement:</b> Set a <u>higher</u> requirement for the number of steps of production so that the winery meets a common-sense understanding of actually being a production winery.</p> <p><b>Require product sold at this facility to be produced at this facility:</b> Keep the requirement in current code that the product sold at this winery is produced at this winery. Wording in the striker allows a barrel in the corner to satisfy "fermentation" and "aging," or a bottle in a cupboard to satisfy "fermentation" and "finishing." <i>for amount of on-site production</i>            In both cases, <u>no minimum threshold</u> is specified, which makes the ordinance weaker than the current requirement of selling only product produced on-site.</p> <p><u>Current violators have clearly shown their willingness to disregard the codes and exploit loopholes. It's imperative that the ordinance not expand those opportunities for demonstrated scofflaws and for those who would follow if the Council shows a weak will.</u></p>	<p>Definitions: Lines 433-463,            Permitted uses: Lines 672-676, 765-769, 1009-1012, 1052-1055</p>
Remove grandfathering	<p>Grandfathering should be eliminated from the ordinance. Grandfathering rewards violators, and as a result encourages future violations. Thus, it fuels the land speculation that is already a serious problem.</p>	<p>Lines 1619-1631</p>
Reduce events to "rural" levels	<p>Please set event limits that are consistent with rural character.</p> <p>24 events per year, and up to 250 guests per event, is not rural in character. I agree with Woodinville's proposal that "rural" is no more than 60 guests per event, and 6 events per year for RA and 2 events per year for A Zone.</p>	<p>Lines 1831-1853</p>
Fine more activities, scale the fines, and increase fines for repeat infractions	<p>The fine structure should scale with the size of the infraction by means of fines per person, per bottle, per ticket, per vehicle, etc.</p> <p>The fine structure should also escalate much higher for repeated infractions. These changes ensure that the biggest violators incur the highest fines, and create a fine structure that results in meaningful deterrence for the biggest violators (which is not the case with the striker's fine structure).</p>	<p>Pages 103-104            Section 29            Line 2104</p>
Commercial activities should use public utility water, not well water	<p>Water supply should not only hook up, but should be <u>required to be used</u> for commercial activities.</p>	<p>Lines 746-748</p>

Susan Boundy-Sanders, as a private citizen

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