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December 22, 2016

Via E-Mail and U.S. Mail

Dana Ayers, Planner
Napa County
Planning, Building & Environmental
Services
1195 Third Street
Napa, CA 94559
E-Mail: Dana.Ayers@countyofnapa.org

Re: Request for Extension of Public Comment Period for
Raymond/Ticen Ranch Winery, Major Modification to Use Permit,
Mitigated Negative Declaration

Dear Ms. Ayers:

I am writing on behalf of my firm's client, Beckstoffer Vineyards, to request an extension of time to comment on the proposed Mitigated Negative Declaration ("MND") that has apparently been prepared for the above-referenced project.

The December 16, 2016, public notice for this project states that the comment period will run from December 16, 2016, through January 17, 2017. However, as of today's date, neither the MND nor the initial study and related supporting documents are available on the County's website and thus they are not readily accessible to concerned members of the public. In addition, a substantial portion of this comment period overlaps with the Christmas and New Year's holiday weekends, a time when many individuals and families are travelling.

As you know, the minimum public comment period allowed under the California Environmental Quality Act for MNDs that are submitted to the State Clearinghouse is 30 days. *See* CEQA Guidelines § 15073. (It is unclear from the public notice whether this MND has been submitted to the State Clearinghouse, but if not, we request that it be submitted.)

Dana Ayers
December 22, 2016
Page 2

Accordingly, given the upcoming holidays, the fact that the MND is not yet available to the public on the County's website, and the substantial public interest in this project, I request that the comment period be extended for a period of at least 30 days after the MND becomes available on the County's website. An extension is especially warranted given that the application was submitted more than a year ago, on September 15, 2015, and the public had no advance notice that the MND would be imminently forthcoming just before the holidays. I also note that this extension would give additional time for the two recently appointed Planning Commissioners to become familiar with their duties and this project.

We can appreciate the effort that has obviously been devoted to preparing the MND, and would like opportunity to review the document and provide thorough and meaningful comments. This is an important opportunity to engage the public in the review process. Therefore, we respectfully request that the comment period be extended for at least 30 days after the MND is available on the County's website.

In addition, could you please add my name to the list of persons receiving notices about this project, including all notices provided pursuant to CEQA or the County's own requirements.

Thank you.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Robert "Perl" Perlmutter

cc: Clients

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