

EXHIBIT “8”

EXHIBIT “8”

EXHIBIT “8”

EXHIBIT
S119

BLIND CURVE
ON JANE RD.



Exhibit 8a
SCR heading SW (down)
mile 6.55 1998

RECEIVED

OCT 9 1998

Heating and Legal Unit
Dept. of Alcoholic Beverage Control
SACRAMENTO

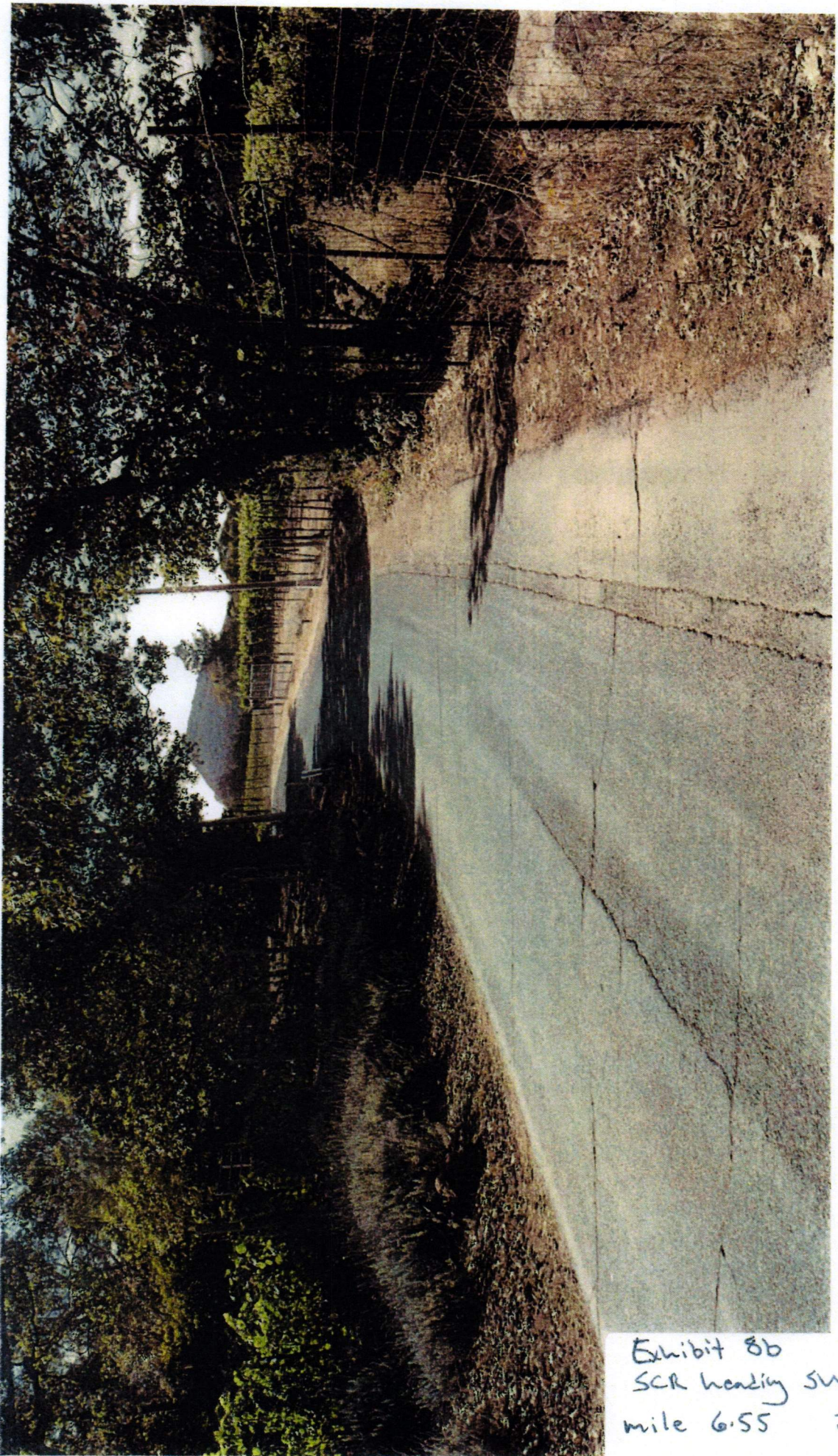


Exhibit 8b
SCR heading SW (down)
mile 6.55 2015



Exhibit 8c
SCR heading SW (down)
mile 6.35 1998

RECEIVED

OCT 9 1998

Hearing and Legal Unit
Dept. of Alcoholic Beverage Control
SACRAMENTO



Exhibit 8d
SCR heading SW (down)
mile 6.35 2015

EXHIBIT
V
Runberg No 5119



RECEIVED

OCT 9 1998

Hearing and Legal Unit
Dept. of Alcohol, Beverage Control
SACRAMENTO

Exhibit 8e
SCR heading SW (down)
mile 6.25 1998



Exhibit 8f
SCR heading SW (down)
mile 6.75 2015



Exhibit 8g
SCR heading SW (down)
mile 6.10 2015

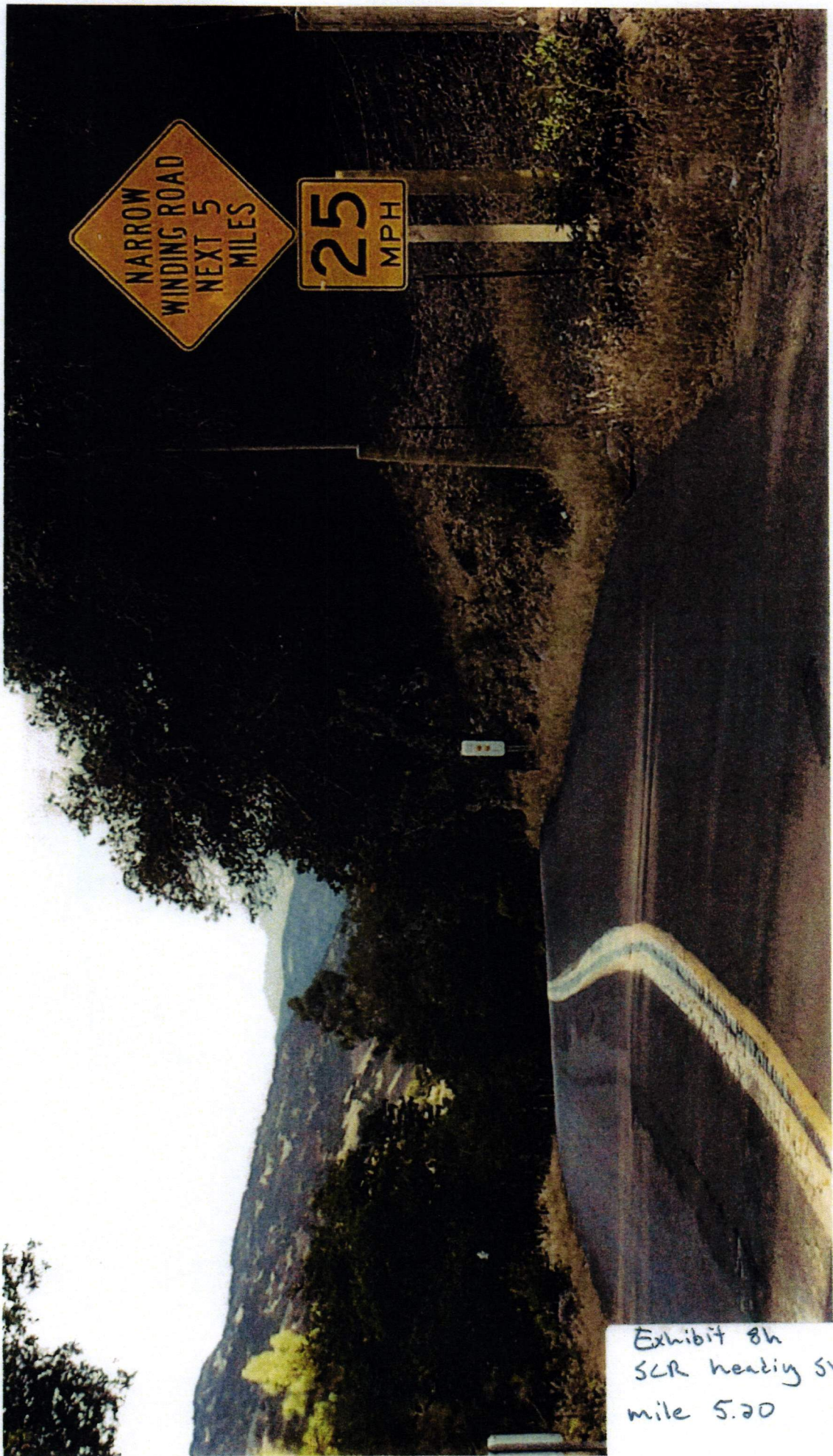


Exhibit 8h
SCR heading SW (down)
mile 5.20 2015



Exhibit 8i
SCR heading SW (down)
mile 5.20 12pm on
5.6.2016

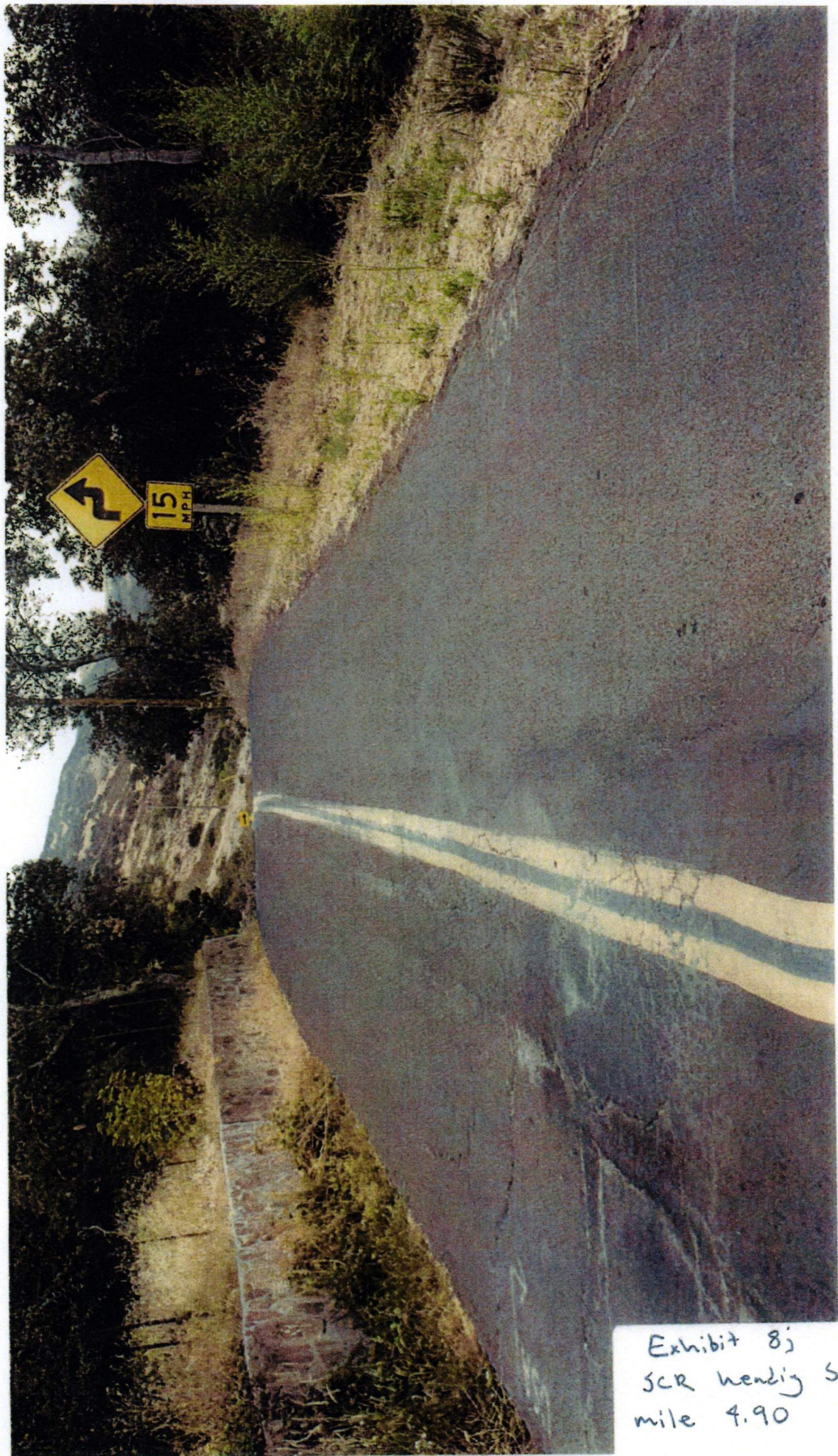


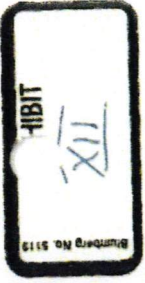
Exhibit 8j
SCR heading SW (down)
mile 4.90 2015



Exhibit 8K
SCR heading SW (down)
mile 4.90 12pm on
5.6.2016



Exhibit 81
SCR heading SW (down)
mile 4.85 12pm on
5.6.2016



BIG DROP OFF
NO GUARD RAIL



Exhibit 8m
SR heading SW (down)
mile 4.80 1998
No Guardrails!

OCT 9 1998

Hearing and Legal Unit
Dept. of Alcoholic Beverage Control
SACRAMENTO



Exhibit 8n
SCR heading SW (down)
mile 4.80 2015
No Guardrails!

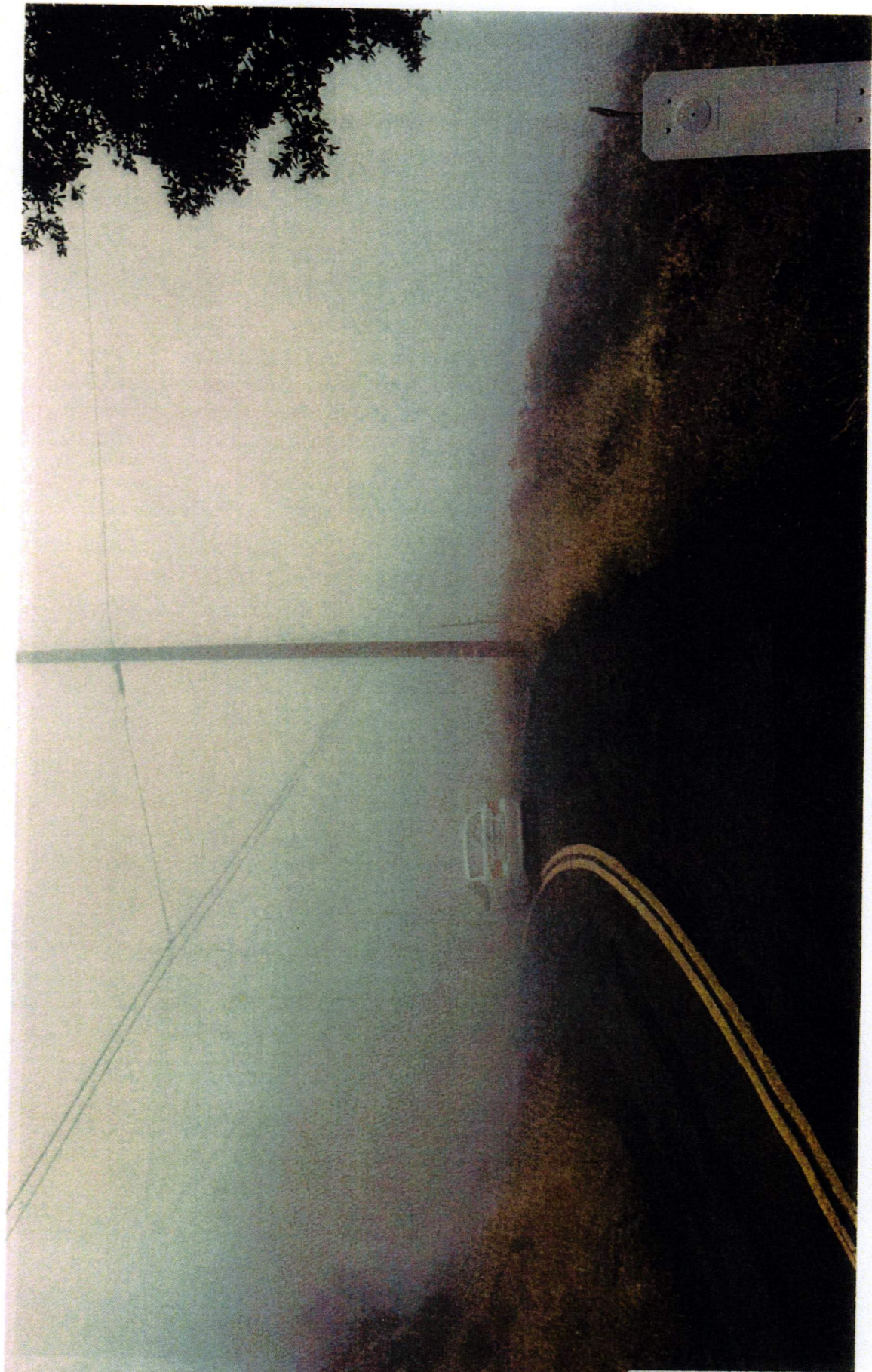


Exhibit 8.0
SCR heading SW (down)
mile 4.80 12pm on
5.6.2016
No Guardrails + FOG!

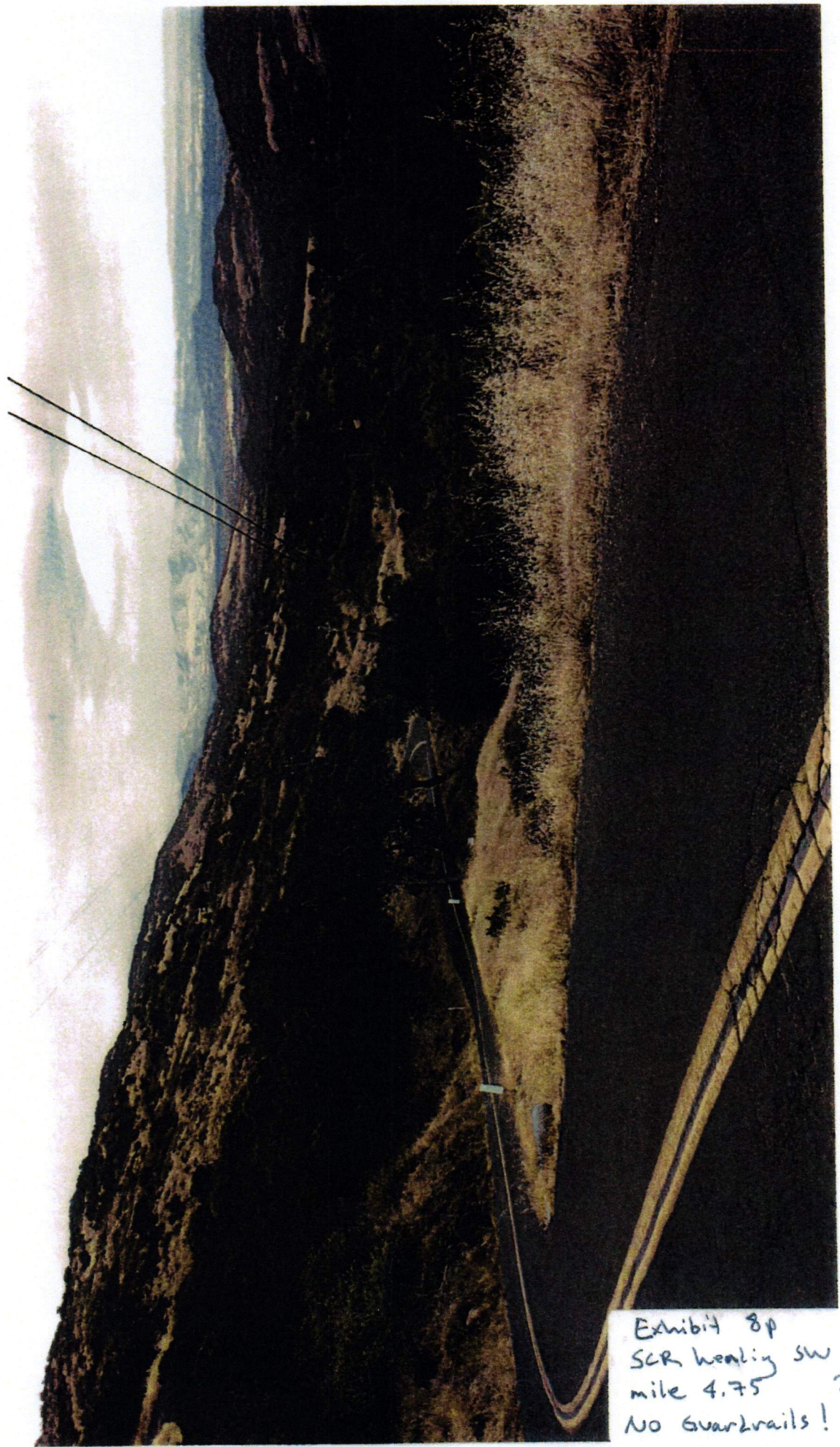


Exhibit 8p
SCR heading SW (down)
mile 4.75 2015
No Guardrails!



Exhibit 82
SCR heading SW (down)
mile 4.75 10pm on
5.6.2016
No Guardrails + Fog!



Exhibit 8r
SCR heading SW (down)
mile 4.65 2015

EXHIBIT

II

Shenberg No. 5115

2 LANE BLIND
CURVE



Exhibit 8s
SCR heading SW (down)
mile 4.50 1998

OCT 9 1998

Hearing and Legal Team
Dept. of Alcoholic Beverage Control
SACRAMENTO



Exhibit 8t
SCR heading SW (down)
mile 4.50 2015



Exhibit 80
SCR heading SW (down)
mile 4.45 2015

EXHIBIT VIII
Drawing No. 5119



Exhibit 8v
SCR heading SW (down)
mile 4.30 1998

RECEIVED

OCT 9 1996

Region 216 Level 204
Dept. of AGRICULTURE and FORESTRY
SACRAMENTO

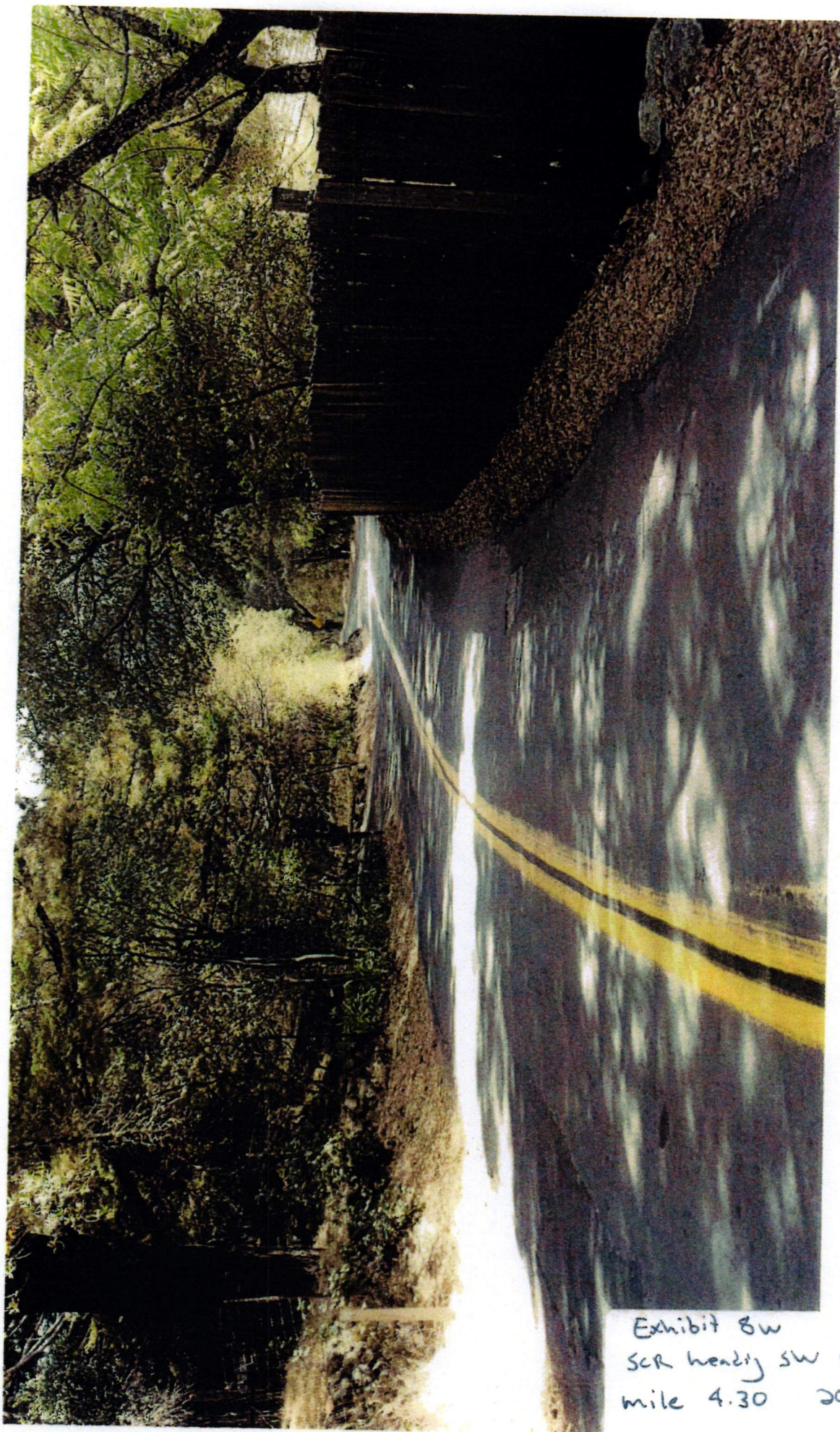


Exhibit 8w
SCR heading SW (down)
mile 4.30 2015



Exhibit 8x
SCR heading SW (down)
mile 4.15 2015

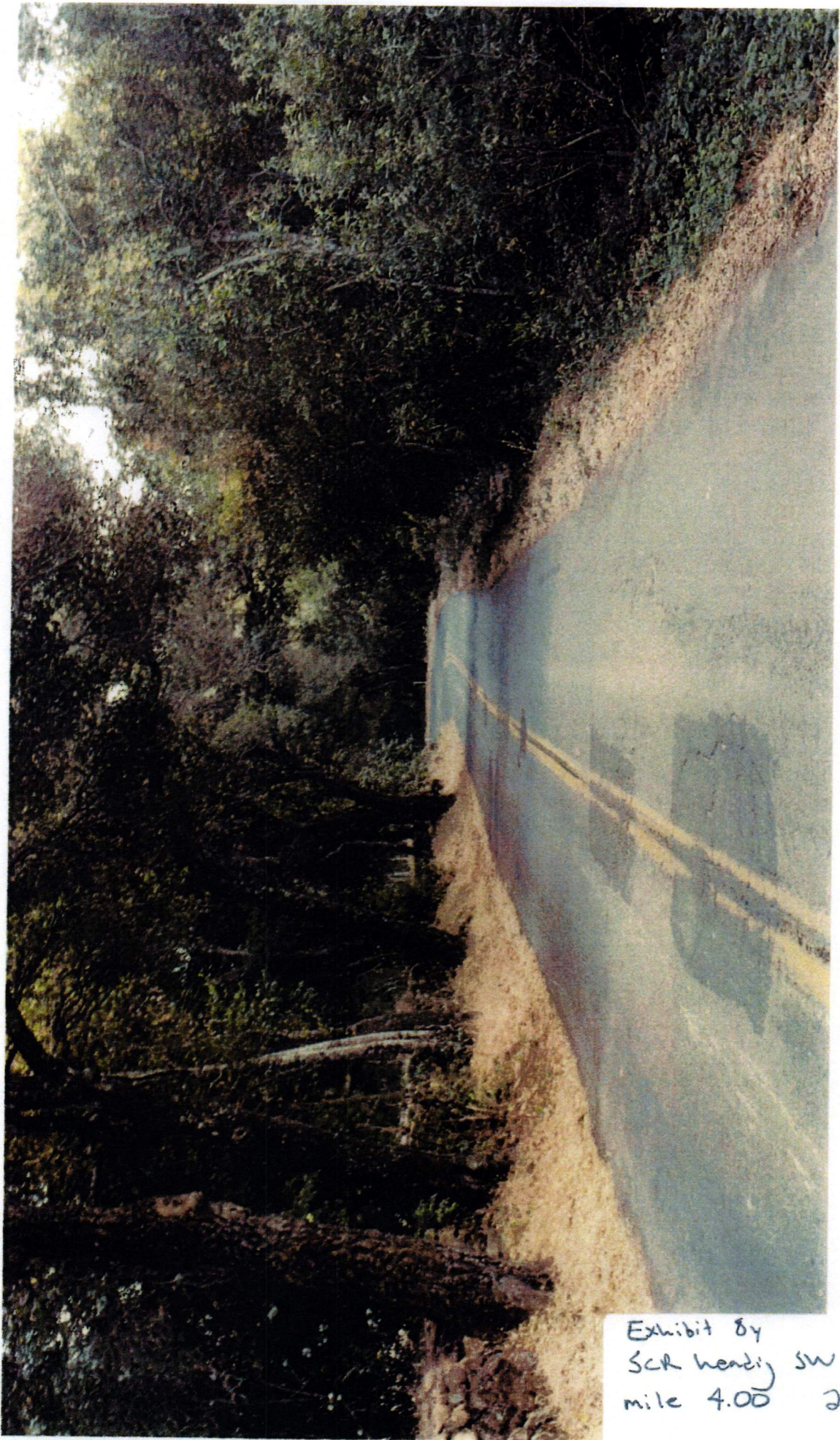


Exhibit 8y
Sch heading SW (down)
mile 4.00 2015

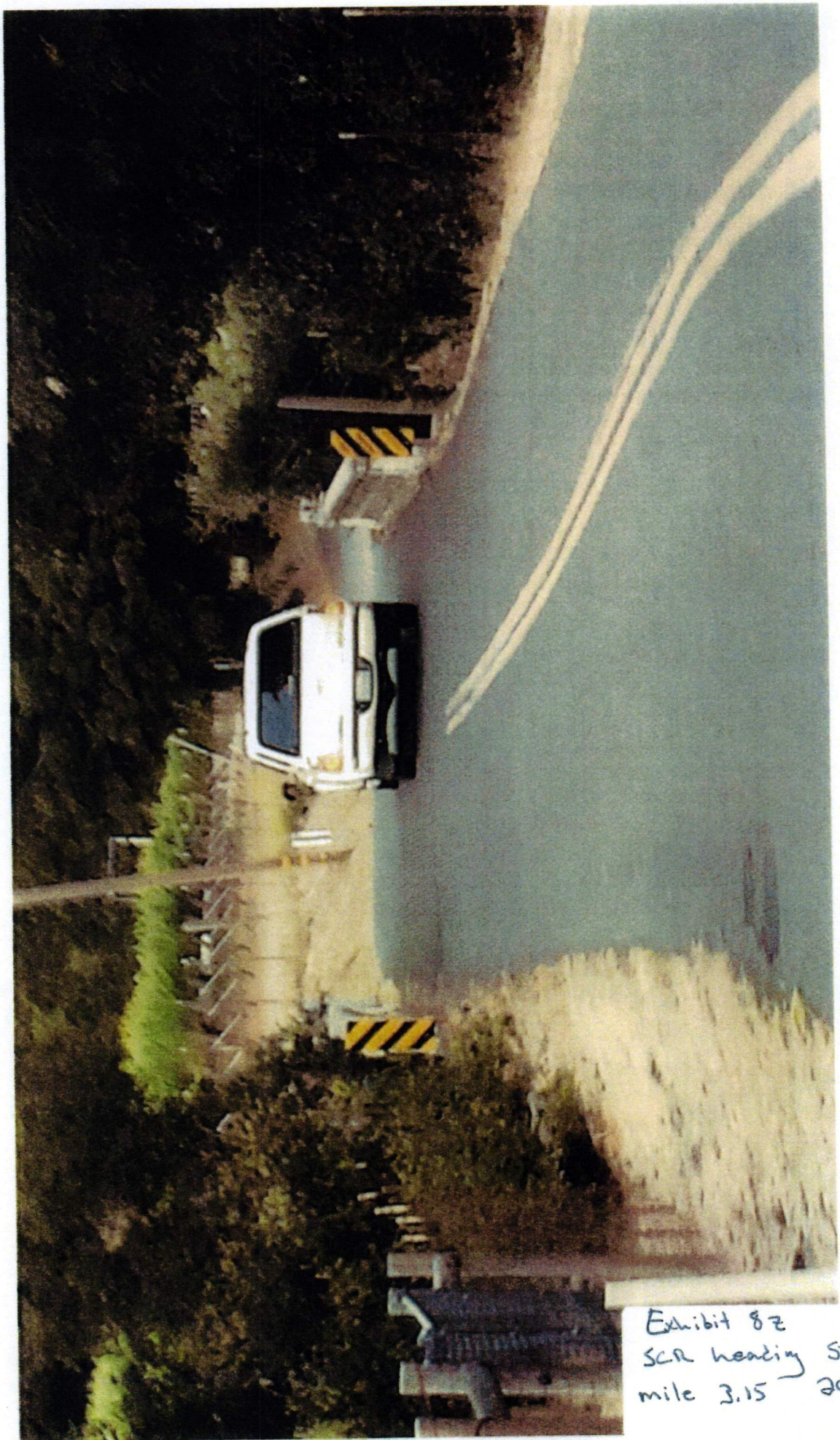


Exhibit 82
SCR heading SW (down)
mile 3.15 2015



Exhibit 8aa
SCR heading SW (down)
mile 2.50 2015

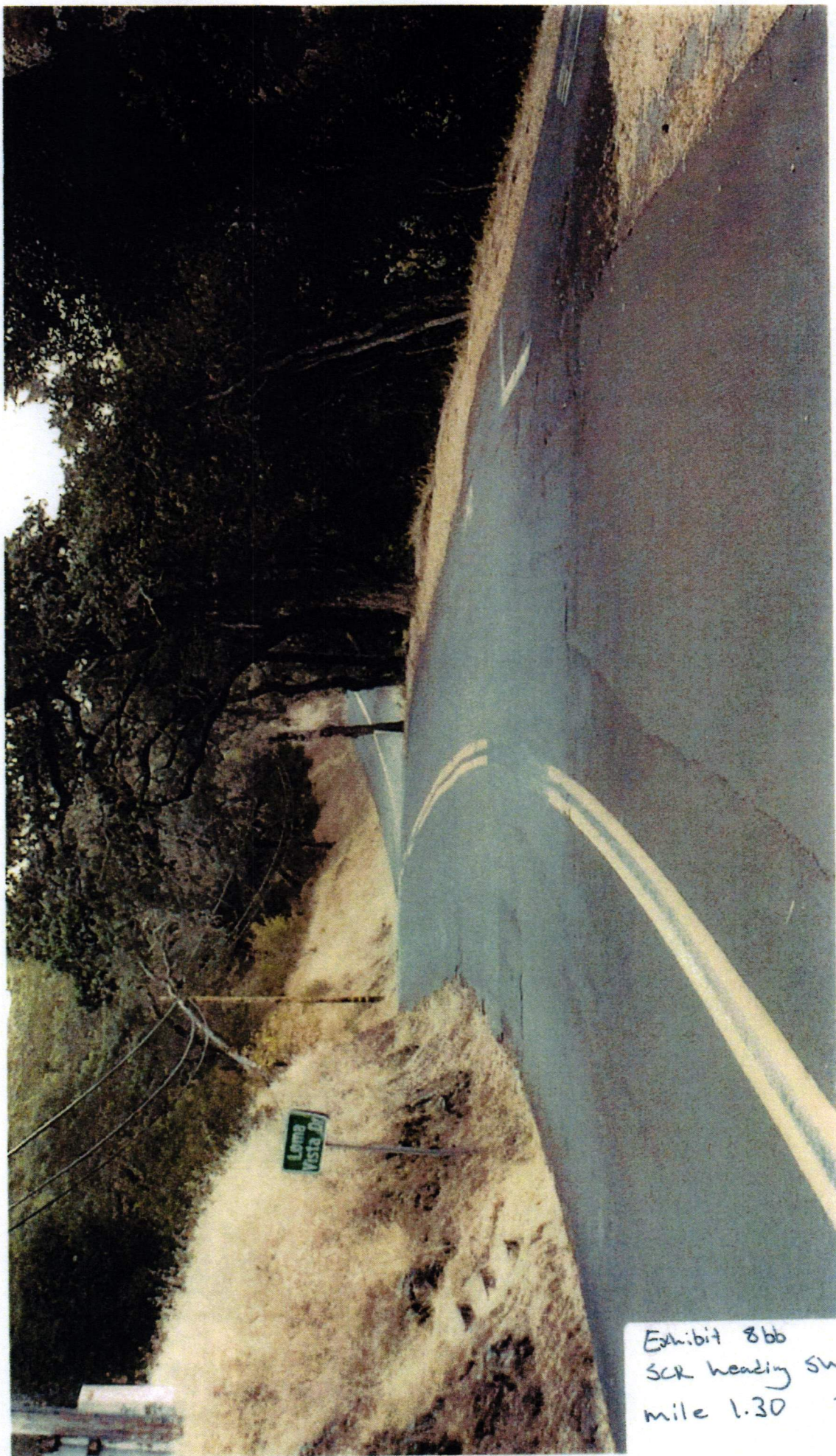


Exhibit 8bb
SCR heading SW (down)
mile 1.30 2015



Exhibit 8c
SCR heading SW (down)
mile 1.10 2015

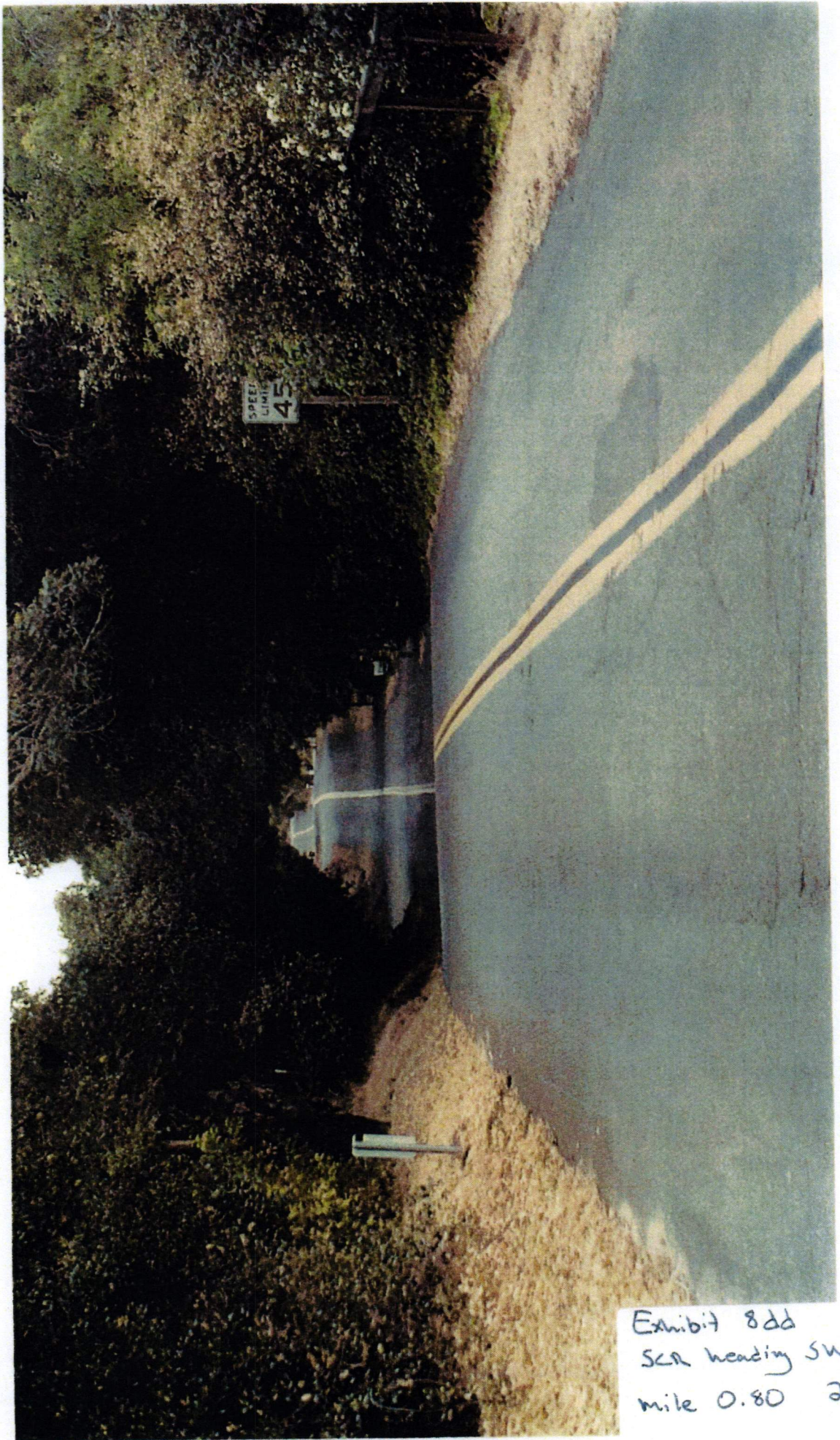


Exhibit 8dd
Scn heading SW (down)
mile 0.80 2015

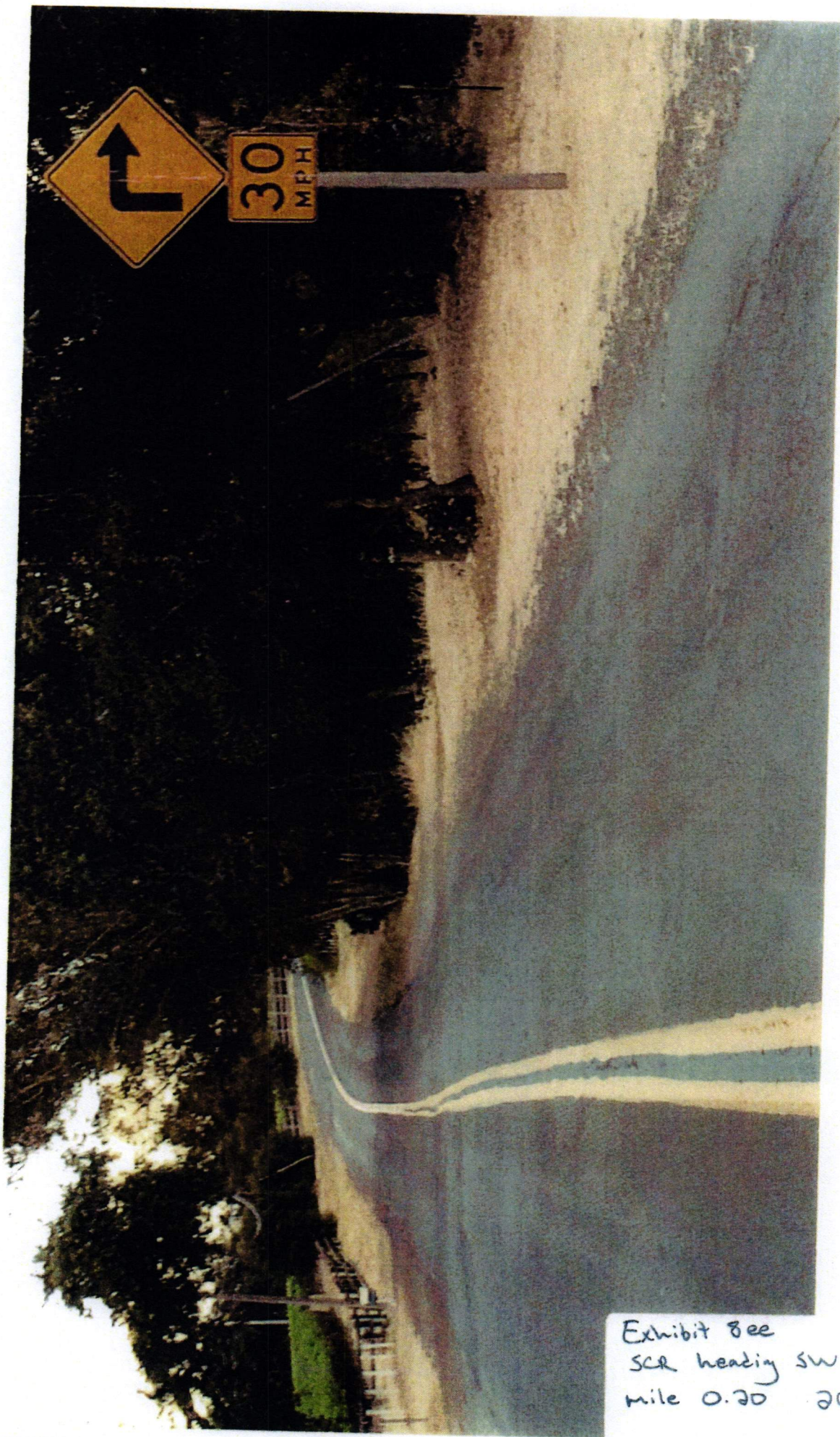


Exhibit 8ee
SCR heading SW (down)
mile 0.20 2015

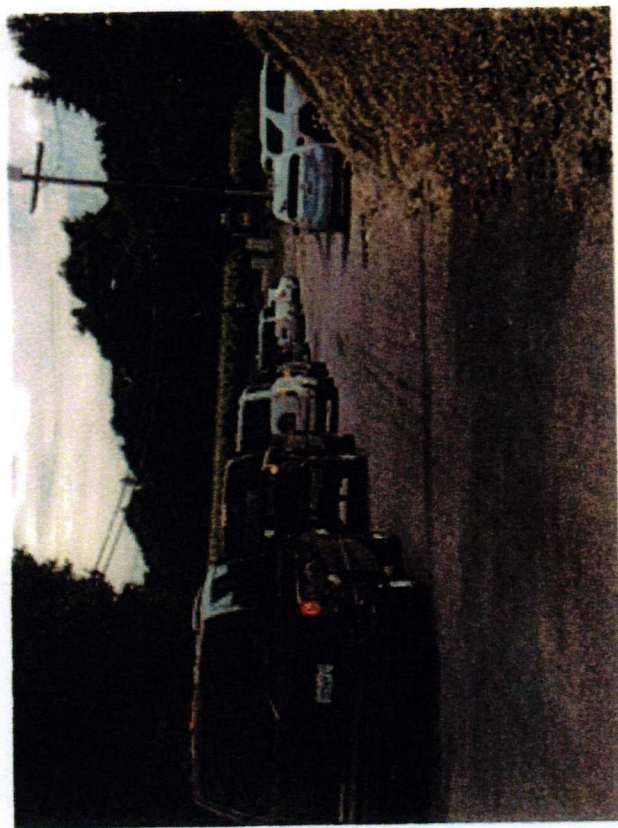


Exhibit 8ff
SCR heading SW (down)
mile 0.00 2015

EXHIBIT “9”

EXHIBIT “9”

EXHIBIT “9”

Video: Included on
USB flashdrive submitted
with this Opposition Letter.
Also available on youtube.
See letter.

"A trip up Soda Canyon Road"
filmed June 2015

EXHIBIT “10”

EXHIBIT “10”

EXHIBIT “10”

Video: Included on USB
flash drive submitted with
this opposition letter. Also
available on youtube.

"A trip up Soda Canyon Road part 2"
Caravan of cars leaving
Stage Coach Vineyards.

EXHIBIT “11”

EXHIBIT “11”

EXHIBIT “11”

RECEIVED

DEC 19 2002

NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT

Fletcher & Roberta Benton
3398 Soda Canyon Road
Napa, CA 94558
250 Dore Street
San Francisco, CA 94103
Tel: (415) 863-7207
12/17/02

Please file
01241 - UP
Krupp

Dear Mr. Kevin Donnelley (ABC), Ms. Kate Dargan (CDF), & Mr. Charles Wilson (Napa County Planning Dept),

Please accept this letter as my protest against a license for Krupp Brothers LLC at 3265 Soda Canyon Road, Napa, File 02395365. My protest is based on the fact that this license may be transferable at a future date and represents their (Krupp Bros) shoe in the door for the greater scheme of building a winery, and conducting other wine related activities. Officer Kevin Donnelley has contacted me in regards to mitigation measures that would allow this license to proceed forward. His question to me was what could I mitigate that would make this possible? I asked him if there was a "shoe in the door mitigation measure" and he said no. The issue now is the same as it was in 1987, traffic and the fact that Soda Canyon Road is a dead end with no way out in case of catastrophe, except back down the hill (Benton v. County of Napa, et al., Napa County Superior Court Action No. 54572 (the "Winery Action"). There are many elderly residents and families with small children in the area. The maintenance of the Krupp vineyard has already caused congestion during school busing hours because of vineyard workers coming and going. Mitigation measure 11 in Articles of Agreement of action No. 54572 states: "Trucking to and from this winery shall be scheduled and operated so as to avoid regular school bus morning pick ups and afternoon deliveries of students operating in the vicinity of the winery. School busing times shall be ascertained through regular contact with public and private school agencies operating school buses in the vicinity of the winery (especially, but not limited to, the N.V.U.S.D. and the Napa County Superintendent of Schools). This was a judgement made as a condition to settle the lawsuit 13 years ago. To my knowledge the County of Napa been unable to regulate or enforce this court order.

The application by the Krupp Brothers LLC is solely for a business office at 3265 Soda Canyon Road, I believe, if approved, this license could be expanded and transferred in the future. If this were to occur the results would be another devastating blow to the residents of Soda Canyon Road in Napa.

Sincerely,



Fletcher Benton

EXHIBIT “12”

EXHIBIT “12”

EXHIBIT “12”

RECEIVED

DEC 17 2002

NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT

Alan & Diane Shepp
3580 Soda Canyon
Napa, CA 94558
707-253-9337 rff
shepp-ad@pacbell.net

December 16, 2002

Charles Wilson, Chair
Napa County Planning Department
1195 Third Street, Rm 210
Napa, CA 94559

and
Investigator Donnelly
Alcohol Beverage Control
50 D Street, Suite 130
Santa Rosa, CA 95404

re: application development permit, file # 01241-UP
Krupp Brothers LLC; submitted 11/20/01

re: Duplicate Permit Application
Krupp Brothers LLC
3265 Soda Canyon Rd, Napa, CA
Veraizon Cellars aka Stagecoach Vineyards

Please
file
with
01241-049-015

Dear Mr. Wilson and Mr. Donnelly,

We request that the application by Krupp Brothers LLC to build a winery on Soda Canyon Road, which would be accessed by a shared private road that has been in existence for over 100 years be denied. And we request that the Duplicate Permit Application to ABC, by same, be denied.

The historic nature of the private gravel road portion of Soda Canyon Road, includes mature oaks and stone walls, began when the homesteader John Grant, settled in this area in the late 1800's. The gravel road is now shared by 25 families. The portion of the gravel road which begins at the turnoff from the county road at the mailboxes and runs to the first creek is a deeded right of way of 40' in width. From the creek (near the Peters residence) to the end of the road it becomes a 40' prescriptive right of way. The maintenance of this road is and has been done by the "Soda Canyon Road Committee" which is composed of all the property owners who live on this private road. We have established a pro-rated schedule of annual fees for the property owners. The funds are used to replace gravel, trim trees and brush removal. The accounts have been maintained by our neighbors, George and Elaine Baker.

Our private road is inappropriate for commercial use. Since the Krupp Brothers LLC, aka Stagecoach Vineyards began their operations the increase of traffic has significantly factored into the deterioration of the road and has dramatically reduced the safety of children and pedestrians. We have enclosed a copy of a previous letter relating to the school bus safety issue. The increased traffic has also had a significant negative impact on the Soda Canyon county paved road that dead ends at the Atlas Peak Winery. Numerous times, large trucks hauling vineyard supplies and barrels have broken down at the steepest part of the road. In one case, an oversized vineyard truck caused a school bus with children, to back down the steepest and most dangerous section of Soda Canyon Road.

To avoid a reoccurrence of the above mentioned dangerous circumstance, several judgments were approved by the Court and issued by the Conservation, Development and Planning Department, Napa County, December 24, 1998: Mitigation Measure #11 (of 15 Mitigation Measures) states that *hauling by trucks on public roads shall not be allowed on Monday through Friday, between 7:00 AM - 9:00 AM and also between 2:00 PM - 4:00 PM on school days, to minimize hazardous conditions during school busing times.* However, it has been our experience, that mitigation measures by the Planning Department are nothing but hot air...never enforced no matter how many private complaints are made... simply because the County has only one person to investigate/enforce infractions of this type.

There have been several accidents on both the Soda Canyon county road and on our private gravel road caused by speeding and unlicensed vineyard workers who abandon their vehicle after an accident. It was agreed at our last road committee meeting to post a speed limit (12 MPH) and to install speed bumps for safety. Both have been abused by the winery workers and Krupp Brothers LLC who saw fit to remove our speed bumps to facilitate their workers and delivery/construction vehicles. The CHP will not respond to accidents on a "private" road. The question then, which law enforcement agency is legally responsible? and who ultimately is liable?

The County requirements for issuing a permit for the Krupp Winery would significantly change the nature, configuration and use of our private road. The 18' width requirement plus 2' shoulder width on both sides would require the removal of many mature oaks and historic stone walls. Please note that the width and shoulder requirements do not include footage necessary for ditches on both sides of the road, that are needed to channel the runoff of rain water. This would add another 4'-6' width to the county requirements.

The County may also consider the requirement of new bridges to span streams that cross the private road and a reconfiguration of the road where dangerous curves exist. One of the cross streams gets its runoff from the Atlas Peak Winery Reservoir. During times of heavy rain (like the past few days) the stream overflows across the gravel road. The runoff from the Atlas Peak reservoir was one of the 15 mitigation measures which the Whitbread consortium (now Atlas Peak Winery) was to address prior to their being issued a permit. We have no record of any enforcement of the those mitigation measures and obviously if there were, then the stream would not wash away the gravel road on a regular basis, as it did again these past few days. Yet another mitigation measure not enforced.

We intend to keep our 100+ year, historic private road as a private road and do not want the County to abridge our right to do so for the sake of an ill conceived commercial winery. Winery tours, tastings, wine sales and special events, even if "private and by invitation only" pose unsafe, hazardous and inappropriate traffic on a private, communally owned gravel road. And there is the question of liability in the event of a vehicular accident on the private gravel road?

In a recent conversation with Kate Dargan of NCFD/CDF, she stated that Krupp has requested exemption from County requirements for certain portions of the road. We insist that no exemptions be approved. We are also concerned about pending Stream Set-back regulations and what effect they will have on Krupp's winery application

We are not asking for mitigation measures that have proven to be ignored paperwork and unenforceable. We ask the County to deny the Krupp Brothers LLC application for a winery on Soda Canyon Road. We also ask that the application for a duplicate permit from ABC, by Krupp Brothers LLC, be denied for many of the above same reasons because we believe that Krupp Brothers LLC will eventually transfer the ABC Duplicate permit if their winery permit is approved.

Sincerely,


Alan and Diane Shepp

enc. ltr, 2/13/02 to Jim King, Chair Planning Commission
cc: Dianne Dillon, District 3 Supervisor
Steve Lederer, Napa County Planning Department
Kate Dargan, NCFD/CDF

Alan and Diane Shepp
3580 Soda Canyon Road
Napa, CA 94558
707-253-9337 tel-fax
shepp-ad@pacbell.net

13 February 2002

Jim King, Chair
Planning Commission
1195 Coombs Street
Napa, CA 94559

re: application development permit, file no. 01241-UP;
Krupp Brothers LLC; submitted 11/20/01

Dear Mr. King,

Our children's school bus was late this morning in picking them up because the school bus was stuck behind a large lumber truck coming up the steep grade of Soda Canyon Road. And as it turns out the load of lumber was being delivered to Jan Krupp's Stagecoach Vineyard site...where it is our understanding they have already begun to build a winery, the permit for which has not been approved!

Further, to the best of our knowledge approximately 10-12 people have been living at the vineyard/proposed winery site for several years in an old converted barn/warehouse and half a dozen trailers. We presume these are legal residences and the proper permits from environmental health have been issued and would like to know if there is to be an increase in residences.

Mr. Krupp claims in his application that the two miles of dirt/gravel road (from the paved Soda Canyon Road to his proposed winery) is his "private driveway". In reality, he has shared the use of this road with approximately twenty five (25) neighbors. The dirt/gravel road has been "shared-access" for one hundred plus (100+) years by those who live here.

The current dirt/gravel road is a one-lane country road, winding around and through trees, narrow in places, with an occasional wide space for two vehicles to pass. During the winter, the road is pocked with many pot-holes and occasionally washed away by winter storms. We, the neighbors of Soda Canyon Road meet several times a year to plan the maintenance and repair of the road. We have spent many hours and thousands of dollars over the years maintaining the road and saving as many trees as possible.

Mr. Krupp may have a right-of-way along the dirt/gravel road just as we all do. However Mr. Krupp's right-of-way is for access to a vineyard not a winery. The difference in use and the ramifications of that difference pose many questions that have not yet been addressed in the permit process. What of the trees? Does the dirt road need to be widened? Does the dirt road need to be improved? If so to what degree? And if so at whose expense? Who will maintain the widened road? Who will be liable in the event of an accident considering the increased public use of the road? Who do we call in the event of an accident, the County Sheriff or Highway Patrol? Will the County be taking over the maintenance of the dirt road, in the event the winery is permitted thereby encouraging increased public use of our private road? If a permit is granted for the winery what mitigation on the use of the road and winery access is projected such as turnouts and speed bumps to curtail the winery workers speeding on the road, which they already do blatantly disregarding the posted speed signs. We also expect that heavy truck traffic be restricted to hours when the school buses are not on the road.

In terms of increased use, what about the paved portion of Soda Canyon Road? We, the neighbors have witnessed a dramatic increase in use due to increased vineyard development with an equal increase in vehicle accidents; large trucks unable to make it up the steep grade - stalling - blocking the road for substantial amounts of time; large trucks unable to make the turns without taking up both lanes - blocking the road. And in one incident, the school bus having to back down the steepest portion so that a large delivery truck could pass down the road.

And what of hillside development? We thought there were new statutes that restricted building, or is that just for residences? Are wineries exempt?

These are but a few of the issues that concern us. We respectfully request that you closely scrutinize the Krupp Brothers LLC application for a winery, take into consideration the issues that concern us and most of our neighbors and deny the permit.

Thank you.

Sincerely,



Alan and Diane Shepp

EXHIBIT “13”

EXHIBIT “13”

EXHIBIT “13”

BEFORE THE
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
OF THE STATE OF CALIFORNIA

IN THE MATTER OF THE PROTEST OF:

Fletcher Benton, et al
3398 Soda Canyon Road
Napa, CA 94558

AGAINST THE ISSUANCE OF A
WINEGROWER'S LICENSE TO:

Soda Canyon Real Estate Investments, Inc.
Astrale e Terra
3148 Soda Canyon Road
Napa, CA 94558

under the Alcoholic Beverage Control Act

RECEIVED

APR 26 1999

Hearing and Legal Unit
Dept. of Alcoholic Beverage Control
SACRAMENTO

FILE 02-344164

REG 98045225

ORDER

The protestant having withdrawn his protest against the issuance of the license, the protest filed herein is moot and good cause appearing therefor, the application is approved upon the conditions set forth in the applicant's Petition for Conditional License dated February 17, 1999.

CERTIFICATE

It is hereby certified that on March 5, 1999 the Department of Alcoholic Beverage Control adopted the foregoing as its order in the proceedings therein described.

Sacramento, California

Dated: March 5, 1999

Sandra J. Meek

Sandra J. Meek
Supervisor, Hearing & Legal Unit

RECEIVED

APR 27 1999

DEPT. OF A.B.C.
FILES

**BEFORE THE
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
OF THE STATE OF CALIFORNIA**

IN THE MATTER OF THE PROTEST OF:

Fletcher Benton, et al
3398 Soda Canyon Road
Napa, CA 94558

AGAINST THE ISSUANCE OF A
WINEGROWER'S LICENSE TO:

Soda Canyon Real Estate Investments, Inc.
Astrale e Terra
3148 Soda Canyon Road
Napa, CA 94558

FILE 02-344164

REG 98045225

**DECLARATION OF
SERVICE BY MAIL**

under the Alcoholic Beverage Control Act

I am over eighteen years of age, and not a party to the within cause; my business address is 3810 Rosin Court, Suite 150, Sacramento, California 95834. I served by CERTIFIED mail a copy of the following documents:

ORDER

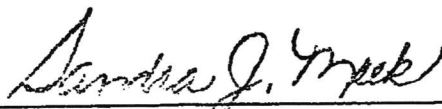
on each of the following, by placing same in an envelope(s) addressed as follows:

Soda Canyon Real Estate Investments, Inc., 5250 Silverado Trail, Napa, CA 94558
Gerald C. Vanoli, Attorney at Law, P.O. Box 479, Lafayette, CA 94549-0479
Malcolm E. McLorg, Attorney at Law, 655 Montgomery St., Ste. 1000, San Francisco, CA 94111-2629
Fletcher & Roberta Benton, 3398 Soda Canyon Rd., Napa, CA 94558
Joseph A. Schreuder, 2882 Soda Canyon Road, Napa, CA 94558-9460
Rebecca Snyder, 3399 Soda Canyon Road, Napa, CA 94558

Each said envelope was then, on March 5, 1999 sealed and deposited in the United States Mail at Sacramento, California, the county in which I am employed, with the postage thereon fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 5, 1999 at Sacramento, California.



Declarant

**BEFORE THE
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
OF THE STATE OF CALIFORNIA**

IN THE MATTER OF THE APPLICATION OF

Soda Canyon Real Estate Investments, Inc.
dba: Astrale e Terra
3148 Soda Canyon Rd.
Napa, CA 94558

FILE 02-344164

REG. 98045225

**PETITION FOR CONDITIONAL
LICENSE**

For Issuance of an original (Type 02) Winegrower License

Under the Alcoholic Beverage Control Act

WHEREAS, petitioner(s) has/have filed an application for the issuance of the above-referred-to license(s) for the above-mentioned premises; and,

WHEREAS, persons residing within the immediate vicinity of the subject premises have protested the issuance of the applied for license; and,

WHEREAS, the protests deal with the proposed operation of the applied for premises; and,

WHEREAS, an Administrative Law Judge, subsequent to an Administrative Hearing, has imposed the conditions stated below; and,

WHEREAS, the issuance of an unrestricted license would be contrary to public welfare and morals;

NOW, THEREFORE, the undersigned petitioner(s) do/does hereby petition for a conditional license as follows, to-wit:

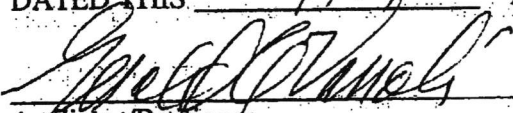
1. No wine tasting is to be permitted at this location.
2. No retail sales of alcoholic beverages to consumers shall be permitted at this location.

This petition for conditional license is made pursuant to the provisions of Sections 23800 through 23805 of the Business and Professions Code and will be carried forward in any transfer at the applicant-premises.

Petitioner(s) agree(s) to retain a copy of this petition on the premises at all times and will be prepared to produce it immediately upon the request of any peace officer.

The petitioner(s) understand(s) that any violation of the foregoing condition(s) shall be grounds for the suspension or revocation of the license(s).

DATED THIS 17th DAY OF February, 1999.


Applicant/Petitioner

Applicant/Petitioner

**BEFORE THE
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
OF THE STATE OF CALIFORNIA**

FEB 0 1 1999

Hearing and Legal Unit
Dept. of Alcoholic Beverage Control
SACRAMENTO

IN THE MATTER OF THE PROTESTS OF:

Fletcher Benton, et al
3398 Soda Canyon Road
Napa, CA 94558

AGAINST THE ISSUANCE OF
A WINEGROWER LICENSE TO:

Soda Canyon Real Estate Investments, Inc.
Astrale e Terra
3148 Soda Canyon Road
Napa, CA 94558

FILE: 02-344164

REG: 98045225

LICENSE TYPE: 02

PAGES: 170

REPORTER: Sims & Sims

PROPOSED DECISION

This matter was heard by Michael B. Dorais, Chief Administrative Law Judge, Department of Alcoholic Beverage Control, Administrative Hearing Office, at Napa, California, on January 21, 1999, at 10:00 a.m.

Nicholas Loehr, Staff Counsel, represented the Department of Alcoholic Beverage Control (hereinafter "Department").

Applicant corporation Soda Canyon Real Estate Investments, Inc., (hereinafter "Applicant") was represented by Gerald Vanoli, Attorney at Law, and President of Applicant. Also present were C. Paul Johnson, Applicant's Chief Executive Officer, and Applicant's Secretary-Treasurer, Lorraine Vanoli.

Protestants Fletcher Benton, Joseph A. Schreuder and Rebecca Snyder were present. Protestant Roberta Benton was not present but was represented by Malcolm E. McLorg, Attorney at Law. Fletcher Benton was also represented by Mr. McLorg.

Evidence was received, the record was closed and the matter was submitted. The Administrative Law Judge now finds, determines and orders as follows:

FINDINGS OF FACT

I

Applicant has applied for a Type 02 winegrower license, pursuant to California Business and Professions Code Section 23356. This license permits the sale of wine and authorizes winetastings on or off the winegrower's premises.

II

The issues raised by the Protestants, and the issues to be determined, are whether granting of the applied-for Type 02 winegrower license will be contrary to public welfare and morals by reason of Article XX, Section 22, of the Constitution of the State of California and Section 23958 of the Business and Professions Code, in that:

1. Normal operation of the license will interfere with the quiet enjoyment by nearby residents of their property .
2. Issuance of the license will create or aggravate a dangerous road condition.
3. Applicant is not equipped to service the public.
4. Bulk wine or grape juice may be transported to the proposed licensed premises.

III

Applicant's premises is a building and parking lot in a vineyard located in a rural area in Napa County. The vineyard is about three-tenths of a mile from Soda Canyon Road which is a country road that leads from the Silverado Trail, a major thoroughfare in Napa County, to where it dead-ends at Atlas Peak Winery, one of two wineries currently licensed by the Department on Soda Canyon Road. While the Atlas Peak Winery is a large undertaking, Applicant's vineyard is relatively small and qualifies under Napa County's "small winery permit exemption".

Applicant's driveway begins approximately 7.5 miles from the point Soda Canyon Road connects to Silverado Trail. During most of that distance, Soda Canyon Road is a narrow two lane paved road with numerous curves and without paved shoulders. The last four-tenths of a mile before the Applicant's driveway is reached, the road is much narrower and can accommodate only one vehicle at a time.

Applicant's vineyard presently has one building measuring 25 x 35 feet and a bottling pad 25 x 10 feet. The building is refrigerated for use in fermentation and production of bulk wine. Applicant intends to produce wine from 22 to 24 acres on its vineyard.

Soda Canyon Real Estate
Investments, Inc.
02-344164
98045225
Page 3

Applicant intends to bring in a crusher and store in bulk the product derived from four types of grapes being grown at the vineyard. Applicant plans to bring two to four barrels of wine to the vineyard to make its varietals and intends to produce about 20,000 gallons of wine annually. Currently, the wine stored in bulk is in a warehouse near St. Helena.

IV

There are no residences within 100 feet of Applicant's premises.

V

There are no Department consideration points such as schools or public playgrounds within 600 feet of Applicant's premises, or churches or hospitals within the immediate vicinity.

VI

Department Investigator Jason Cvitanov contacted the Napa County Development Department, which is the local planning agency in the area where the premises is located and learned from Director Bob Nelson that Applicant's vineyard was exercising a valid use permit from Napa County.

VII

Joseph Schreuder resides at 2882 Soda Canyon Road and shares 65 feet of common property line with Applicant. Mr. Schreuder has resided at this location for 42 years and has observed changes in the area during that period. When he moved to Soda Canyon Road in April 1957, the area along the road was entirely residential, except for a sheep ranch where Atlas Peak Winery is now located.

While describing traffic on Soda Canyon Road, Mr. Schreuder provided the pickup times (7:00 a.m., 7:20 a.m. and varies) for three school buses serving local students attending high school, elementary school and special education classes, as well as the return bus times (noon, 2:30 p.m. and 4:00 p.m.). To turn around to drive back down Soda Canyon Road, these school buses utilize a wide spot in the road about where the two lane road becomes the one lane portion before Applicant's driveway is reached.

Mr. Schreuder has observed a significant increase in traffic on Soda Canyon Road due to operation of the vineyards.

VIII

Fletcher C. Benton owns property at 3398 Soda Canyon Road and shares a common boundary with Applicant. Mr. Benton bought five acres with a house at this location as a week-end retreat, but the peace and quiet envisioned when he purchased the property in 1970, when the area was residential and not heavily trafficked by persons working or visiting Atlas Peak Winery, has been adversely affected by reason of the commercial activity of vineyards.

IX

Mrs. Rebecca Snyder has resided at 3399 Soda Canyon Road for 22 years. Mrs. Snyder stated Soda Canyon Road rises 1500 feet from the valley floor and in addition to being subject to frequent foggy conditions in the fall and spring, has many blind corners.

Mrs. Snyder testified that 13 homes are located on the one lane portion of Soda Canyon Road immediately before Applicant's driveway leads from the road.

Car traffic from vineyard workers has become a traffic problem and Mrs. Snyder considers the road is now dangerous. Mrs. Snyder is opposed to increasing car traffic by attracting visitors to a new winery.

X

Muriel Hankins resides at 3354 Soda Canyon Road. Her home is located on that portion of the road which is one lane wide before Applicant's driveway.

During her 34 years of residence at this location, she has observed a significant increase in the number of vehicles using Soda Canyon Road since Atlas Peak Winery began operation. In addition to large trucks transporting wine barrels, the vineyard workers use the road and they drive faster than conditions permit. By her count one morning, twenty cars with vineyard workers passed her home on the way to Atlas Peak Winery.

XI

C. Paul Johnson is a Napa County resident who is Chief Executive Officer for Applicant. Mr. Johnson testified that Applicant's vineyard is 66 acres, of which 24 acres are currently planted with Merlot and Cabernet grapes. Applicant's vineyard qualified for a Napa County "small winery exemption permit" which had been obtained by the vineyard's prior owner and still is in effect since Applicant's production does not exceed the local ordinance's limit of 20,000 gallons or 5,300 cases annually.

Soda Canyon Real Estate
Investments, Inc.
02-344164
98045225
Page 5

Mr. Johnson stated Applicant has no intention to put in crushing equipment preferring to outsource such production work because that is more economical. Similarly in Mr. Johnson's view, public tasting is not an economical proposition, so Applicant does not intend to build a wine tasting room.

Mr. Johnson stated Applicant is seeking a winegrower license in order to be able to sell the wine produced from the vineyard.

XII

Douglas Hill has been a vineyard manager for 18 years. In addition to managing Applicant's vineyard, he manages a number of other local vineyards. He testified that that vineyards result in increased traffic because large numbers of workers and trucks are required. However, he believes the impact on traffic due to a winery operation to be minimal by comparison.

XIII

Gerald Vanoli is President of Applicant and also serves as Applicant's attorney. Mr. Vanoli presented evidence regarding traffic accidents on Soda Canyon Road. During the past five years, there have been three alcohol related single vehicle accidents and these occurred outside of business hours (i.e. before 6:00 a.m. or after 6:00 p.m.). In addition, there have been ten single vehicle accidents during business hours and one two-vehicle collision. One truck/trailer accident took place during this period.

Mr. Vanoli testified that Applicant does not intend to conduct wine tasting for the public except by appointment. Testimony indicated local law prohibits public winetasting or tour visits except by appointment. However, such limits may be subject to change and Mr. Vanoli indicated that Applicant did not want restrictive conditions on its license.

DETERMINATION OF ISSUES

I

Article XX, Section 22, of the Constitution of the State of California provides that the Department of Alcoholic Beverage Control has the power, in its discretion, to deny an application for an alcoholic beverage license if it determines for good cause that the granting of the license would be contrary to public welfare or morals.

II

Evidence established that increased traffic on Soda Canyon Road would interfere with the quiet enjoyment of nearby residences.

III

Evidence established that increased traffic on Soda Canyon Road would aggravate a traffic problem on a problematic roadway which serves Applicant, nearby residents and two other vineyards.

IV

Evidence did not establish any legal impediments to issuance of the applied-for license relating to the issues raised by Protestants regarding current lack of winetasting facilities on the proposed premises or the importation of wine or grape juice to Applicant's proposed premises.

V

Pursuant to Determination of Issues II and III, issuance of the applied-for license would be contrary to public welfare or morals. However, it is recognized that Applicant's primary present purpose in seeking a winegrower license is to enable Applicant to sell the wine it has produced and wine which it intends to produce. In addition, Applicant may wish to operate either on its own or in a cooperative venture with winegrower licensees, a winetasting and sales operation under a duplicate winegrower license at a location away from the vineyard. Accordingly, it appears that conditions on the applied-for license could resolve the concerns of Protestants while not impeding Applicant's primary commercial objectives.

ORDER

The protests are sustained, provided, however, if Applicant within 30 days of this Decision's effective date, petitions the Department for the issuance of a conditional license which contains all of those conditions set forth below, then the issuance of the license would not be contrary to public welfare and morals; the protests are overruled and the conditioned license shall issue.

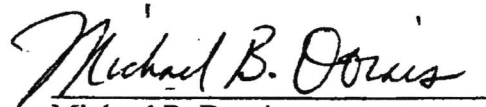
The proposed conditions:

1. No winetasting or tasting by appointment shall be permitted at this location.

Soda Canyon Real Estate
Investments, Inc.
02-344164
98045225
Page 7

2. No retail sales of alcoholic beverages to walk-in customers shall be permitted at this location.

Dated: January 25, 1999



Michael B. Dorais
Chief Administrative Law Judge

STATE OF CALIFORNIA
Department of Alcoholic Beverage Control
3810 Rosin Court, Suite 150
Sacramento, CA 95834

I hereby protest the issuance of a license under the Alcoholic Beverage Control Act to

Soda Canyon Real Estate Investments Inc.
Name (s) of Applicant (s)

For premises at 3148 Soda Canyon Rd, Napa, CA.
Exact address of proposed premises

on the grounds that: #2 Please see attached

RECEIVED

AUG 04 1998

Receiving and Control Unit
Dept. of Alcoholic Beverage Control
Sacramento

JUL 31 1998

Department of Alcoholic
Beverage Control
San Francisco

Fletcher Benton

Name of Protestor

declare under penalty of perjury:

That I am the protestant herein. That I have read the above protest and know the contents thereof;
That the same is true of my own knowledge except as to those matters which are therein stated on
information and belief, and as to those matters I believe to be true

Executed on July 31, 1998 at San Francisco California.

Fletcher Benton

Name (printed)

[Signature]
Signature of Protestor

[Redacted]

Telephone Number

3398 Soda Canyon Rd, Napa, CA 94558
Address of Protestant

STATE OF CALIFORNIA
Department of Alcoholic Beverage Control
3810 Rosin Court, Suite 1
Sacramento, CA 95834

I hereby protest the issuance of a license under the Alcoholic Beverage Control Act to

Soda Canyon Real Estate Investments Inc.
Name (s) of Applicant (s)

For premises at 3148 Soda Canyon Rd., Napa, CA.
Exact address of proposed premises

on the grounds that: #2 Please see attached

JUL 31 1998

Department of Alcoholic
Beverage Control
San Francisco

Roberta Benton declare under penalty of perjury:
Name of Protestant

That I am the protestant herein. That I have read the above protest and know the contents thereof.
That the same is true of my own knowledge except as to those matters which are therein stated on
information and belief, and as to those matters I believe to be true.

Executed on July 31 1998 at San Francisco California.

Roberta Benton
Name (printed)

[Redacted Signature]
Signature of Protestant

[Redacted Telephone Number]
Telephone Number

3398 Soda Canyon Rd., Napa, CA. 94558
Address of Protestant

RECEIVED

AUG 04 1998

Dept. of Alcoholic Beverage Control

V

This letter is in protest to the application for the sale of alcohol at 3148 Soda Canyon Road in Napa, CA. The location of this property is at the end of a very narrow, two-lane, dead-end county road with 100% restricted passage for over 7 miles. There is an inadequate turnaround at the end. The last 3/4 mile of this road is a one-lane drive with blind curves. Also, at the end of the road is the Atlas Peak vineyards/winery with over 1100 acres of grapes and 36000 square feet of caves, which from my understanding is used by not only Atlas Peak, but other wineries. The maintenance workers, vineyard workers, and heavy equipment traveling there is already, by normal traffic standards, overburdening the safety of Soda Canyon Road. In addition, Atlas Peak has tours and tastings, party functions with loud music and to my knowledge makes no reports to the county of Napa on the mitigated measures for having a winery which already limits them to a given number of events.

There are numerous deliveries at this winery, including trucks full of bottling supplies, UPS, FedEx and whatever else is needed to support an operation of this magnitude, and there are thousands more acres which are still to be planted. The workers, equipment and contractors for these new areas will add more traffic on these 7 narrow miles of Soda Canyon where no passing is allowed. This is just to mention a few of the factors on congestion on the road. In addition to the above, there are property owners who have been living there for decades with families that seem to have been overlooked by the Napa county government. When Atlas Peak got its foot in the door, with lots of money, many of us were aware that this was just the beginning of the end of a way of life we all had enjoyed. The past ten years has proven it. Now, the applicant at 3148 Soda Canyon is requesting a permit to sell alcohol. They are no more equipped than I am to service the public. The road to their log house is a 10' wide asphalt road, possibly 1/4 mi long and from my knowledge, there are no public restrooms, parking facilities, no sound barriers, no public place to transact business and certainly no ability to produce the boutique winery limit of 20000 gallons of wine per year. There is a suspicion that bulk wine will be brought in from elsewhere.

I would like the applicant to state what their full intentions are and why they need an onsite license for sale of alcohol.. It may be they want to enhance the value of the property at a cost to the people who have lived there, in some cases, for generations. It makes no business sense for them to be issued a permit to sell alcohol. It is my understanding that this group has other wine properties on the valley floor that would be more suitable for sale of alcohol than the property at 3148 Soda Canyon Road.

RECEIVED

AUG 04 1998

PLANS & PERMITS
DEPT. OF PUBLIC WORKS
CITY OF NAPA

The objections I have to the selling of alcoholic beverages at 3148 Soda Canyon Road have mainly to do with safety on a narrow, two and one lane dead-end county road. Soda Canyon Rd beginning at Silverado Trail, runs for about 7.2 miles, climbing from the valley floor to over 1300 feet at the end where 3148 is located. There are many steep and blind curves on this road; no guardrails anywhere; no turnoffs; nowhere to go but down several hundred feet over a cliff if you needed to avoid an accident. This road is travelled twice a day by a school bus which travels the entire distance. The road is usually in very bad condition due to the amount of traffic already generated by the large vineyard/winery at the end of the road (Atlas Peak) and the heavy equipment brought up there. This is why it is not a suitable place to sell alcohol, or for tourists, who may not be familiar with the road. I'm assuming that this permit would not allow the consumption of alcoholic beverages as this would be foolhardy and dangerous to everyone.

RECEIVED

AUG 04 1993

Meeting and of the
Dept. of Alc. and Tobacco Control
Sacramento, CA

2882 Soda Canyon Rd.
Napa, CA 94558

July 31, 1998

STATE OF CALIFORNIA
Department of Alcoholic Beverage Control
3810 Rosin Court, Suite 150
Sacramento, CA 95834

RECEIVED

JUL 31 1998

Dept. of Alcoholic Beverage Control
Santa Rosa

I hereby protest the issuance of a license under the Alcoholic Beverage Control Act to: **SODA CANYON REAL ESTATE INVESTMENTS, INC.** (Corp. add: 5250 Silverado Trail, Napa, CA 94558) For premises at: **3148 SODA CANYON ROAD, NAPA CA 94558** on the grounds that: the direct merchandising of alcoholic beverages at the proposed location is utterly inappropriate since it is at the end of a tortuous country road (Soda Canyon Road) which rises to ~ 1,450 ft. during the 6+ mile trek to the proposed point of sale. Each school day there are six round trips by school buses. Each work day there are countless private motor vehicle round trips carrying agricultural workers and, to a lesser extent, winery workers as well as construction workers, currently, along with a great deal of heavy trucking for both the extensive construction activities and wine production. To superimpose upon all this, additional traffic for the purpose of selling an alcoholic beverage at its remote production location is unconscionable.

This sort of "development" seems to be degenerating what once was the prime environment of the Napa Valley into a tourist theme park which might well be named "Grape America" already replete with a plethora of concession stands euphemistically referred to as "boutique wineries" of which the activity at issue in this application is but one more.

Additionally, the "INSTRUCTIONS FOR PREPARING AND FILING PROTESTS AGAINST APPLICATIONS FOR ALCOHOLIC BEVERAGE LICENSES" [ABC-510 (6/94)], specifies that "A COPY OF YOUR PROTEST WILL BE GIVEN TO THE APPLICANT." Based on this and equitable consideration, I request that a copy of the application at issue and its supporting documents be sent to me as a legitimate protestant.

I, Joseph A. Schreuder, declare under penalty of perjury:

That I am the protestant herein: That I have read the above protest and know the contents thereof: That the same is true of my own knowledge except as to those matters which are therein stated on information and belief, and as to those matters I believe to be true.


Executed on July 31, 1998 at Napa California.

RECEIVED

AUG 04 1998

Joseph A. Schreuder
Name


Signature of Protestant


Telephone Number

2882 Soda Canyon Rd., Napa, CA 94558
Address of Protestant

V

RECEIVED

AUG 05 1998

Hearing and...
Dept. of Alcoholic Beverage Control
SACRAMENTO

Licensee Name SODA CANYON REAL ESTATE INVESTMENTS, INC.

File Number 344164

MUST BE RECEIVED BY AUGUST 6, 1998

**STATE OF CALIFORNIA
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
PROTESTANT'S/COMPLAINANT'S DECLARATION**

I, Rebecca Snyder, declare
PLEASE PRINT

under penalty of perjury.


That I am the protestant/complainant herein; that I have read my previously-submitted protest/complaint and know the contents thereof; that the same is true of my knowledge except to those matters which are therein stated on information and belief, and as to those matters I believe them to be true.

Executed on Aug. 2, 1998, at
(Date)

Napa California, California
(Place)

(Signature) [Redacted Signature]

Address 3399 Soda Canyon Rd
Napa California

 Mrs. Rebecca Snyder
3399 Soda Canyon Rd.
Napa, CA 94558-9758

94558

Notice: This verification constitutes a personal oath and must, therefore, be signed by each individual verifying the protest.

ABC-128 (3/97)

I am going to Europe in September.

7-16-98

Re: License to permit
the sale of alcoholic
beverages at 3148 Soda Canyon Rd
Napa, Calif 94558

RECEIVED

JUL 20 1998

Hearing and Legal Unit
Dept. of Alcoholic Beverage Control
Sacramento

Dear Sir:

As a resident of Soda Canyon Rd
for twenty-two years I was outraged
to see the sign posted on July 3rd,
that a liquor license was being sought.

The last .25 mile of Soda Canyon Rd.
is barely two lanes - has many blind corners -
And does not even have a line down the
middle! It is extremely hazardous
when the normal vineyard traffic leaves
and comes let alone "tipsy-tasters"
trying to drive it.

COPY SENT

JUL 20 1998

Atlas Peak winery has been very courteous
(in the respect) that it does not allow public
tastings. It has private tours twice yearly -
only. It is the winery located above
the prospectus.

(Cont.) ->

(Sincerely,
[Redacted Signature])

#2

There is very likely going to be a heated court battle over this. I can't think of one resident living up here that I will not fight this.

Soda Canyon Rd. is 6.5 miles of rural country road with mostly blind corner turns and deteriorating asphalt. It is barely 2 lanes. In the winter that last 2.5- to 3 miles has dense fog in the mornings and evenings. The elevation goes from the valley floor to 1500 ft. level. Our weather is more extreme here — as we get almost double the rainfall of the Napa Valley and are subject to high winds. What a lousy location for a tasting room! It sounds like nothing but pure greed to me.

Please, don't add to the hazardous road conditions by granting this license! COPY SENT JUL 20 1998

RECEIVED

JUL 20

Training and Legal Unit
Dept. of Alcohol & Tobacco Control
Sacramento

Sincerely,

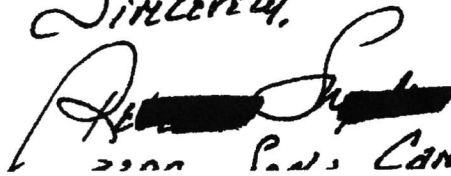

2200 Soda Canyon Rd

EXHIBIT “14”

EXHIBIT “14”

EXHIBIT “14”

Winery Visitation from Current and Future Wineries on Soda Canyon Road & Intersection w/ Silverado Trail

Name	Status	County Approval Date	Has Cave	Cave Size (sf)	Production (Gallons)	Type of Tours, Tastings	Daily Visitation (Ppl/Day)	Daily Visitation (Ppl/Week)	Daily Visitation (Ppl/Year)	Marketing Visitation (Events/Year)	Marketing Visitation (Ppl/Year)	TOTAL Annual Visitation
Producing Wineries: ACCESSED BY SODA CANYON RD												
ANTICA NAPA VALLEY												
3700 Soda Canyon Road	PROD	1987	x	36,000	450,000	PVT	20	100	5,200	-	-	5,200
ASTRALE E TERRA/MEADOWROCK WINERY												
3148 Soda Canyon Road	PROD	1988		-	20,000	TST APPT	-	1	52	-	-	52
LA VALLETTE WINERY												
Soda Canyon Road	UNKNWN	1988		-	20,000	TST APPT	-	-	-	-	-	-
ROY ESTATE VINEYARDS												
1220 Soda Canyon Road	APVD	2002	x	6,500	12,000	APPT	10	40	2,080	12	630	2,710
THE CAVES AT SODA CANYON												
2275 Soda Canyon Road	PROD	2006	x	16,000	30,000	APPT	20	70	3,640	18	1,320	4,960
V-12 WINERY												
2001 Soda Canyon Road	APVD	2009	x	7,000	22,500	APPT	16	36	1,872	5	300	2,172
WHITE ROCK VINEYARDS												
1115 Loma Vista Drive	PROD	1987	x	6,000	20,000	TST APPT	2	10	520	-	-	520
RELIC WINERY												
(County Approved, but still Pending ABC Approval)												
2400 Soda Canyon Road	APVD	2010	x	2,458	20,000	APPT	20	*	4,180	11	278	4,458
Total Existing Winery Visitors on/accessed by Soda Canyon Road											20,072	
Producing Wineries: ON SILV. TR. At Intersect. w/ SCR												
REYNOLDS FAMILY WINERY (Existing)												
3266 Silverado Trail	PROD	2000		-	20,000	APPT	10	70	3,640	3	100	3,740
BLACK STALLION WINERY												
4089 Silverado Trail	PROD	1985		-	100,000	PUB	50	350	18,200	-	-	18,200
Total Existing Winery Visitors on Silverado Trail at Intersection w/ Soda Canyon Road											21,940	
Pending Approval: ACCESSED BY SODA CANYON RD												
GRASSI FAMILY WINERY												
1044 Soda Canyon Road	PEND				25,000	APPT	12	70	3,640	3	155	3,795
MOUNTAIN PEAK WINERY												
3265 Soda Canyon Road	PEND		x	33,424	100,000	APPT	60	275	14,300	6	275	14,575
Total Pending Winery Visitors on/accessed by Soda Canyon Road											18,370	
Pending Approval: ON SILV. TR. At Intersect. w/ SCR												
BEAU VIGNE WINERY												
4057 Silverado Trail	PEND				14,000	APPT	15	105	5,460	14	360	5,820
CORONA WINERY												
3165 Silverado Trail	PEND				100,000	APPT	48	336	17,472	80	2,428	16,988
REYNOLDS FAMILY WINERY (Expansion of Existing)												
3260 Silverado Trail	PEND				40,000	APPT	40	280	14,560	10	618	15,178
SAM JASPER WINERY												
4059 Silverado Trail	PEND				20,000	APPT	25	160	8,320	23	550	8,870
Total Pending Winery Visitors on Silverado Trail at Intersection w/ Soda Canyon Road											46,856	
Subtotal EXISTING WINERY VISITORS at/near Intersection of Silverado Tr. & Soda Canyon Rd.											42,012	
Subtotal PROPOSED WINERY VISITORS at/near Intersection of Silverado Tr. & Soda Canyon Rd.											65,226	
GRAND TOTAL ANNUAL WINERY VISITORS at Intersection of Soda Canyon & Silverado Trail IF ALL PERMITS APPROVED											107,238	
Increase from Existing Traffic to Future Total if All Approved (as a percentage)											155%	
Key APVD: Approved Winery, NOT producing PEND: Winery pending approval PROD: Active winery UNKNWN: Status unknown, needs follow-up						Key APPT: By appointment only NO: No tours, no tasting PUB: Open to public, no appointment necessary PVT: Private TST APPT: Tasting by appointment only						
Date: December 15, 2016 Data Compiled by: Amber Manfree, PhD Source: Napa County Winery Database & Napa County Documents												

EXHIBIT “15”

EXHIBIT “15”

EXHIBIT “15”

Understanding Traffic Trips Generated by the Mountain Peak Project (Revised)

Trips to be Added On Soda Canyon Road as Proposed by Mountain Peak					
	Number of Daily Trips Added as Proposed by Mountain Peak	Total Number of "Typical" Annual Trips Added to SCR as Proposed by Mountain Peak	Number of Daily Trips Added for two (2) Marketing Events for 75 People as Proposed by Mountain Peak	Number of Daily Trips Added for one (1) Marketing Event for 125 People as Proposed by Mountain Peak*	GRAND TOTAL TRAFFIC Added to SCR by Mountain Peak Project (includes "Typical" and "Marketing Event" traffic)
Typical Weekday	114	41,610	144	129	41,883
Typical Saturday	112	40,880	144	129	
Typical Crush Saturday	116	42,340	144	129	
Average	114	41,610	144	129	

Existing Vehicle Traffic at Intersection of Silverado Trail & Soda Canyon Road					
	May 2013 Two-Way Traffic Counts taken by Crane Transportation at SCR/ST Intersection (Vehicles Per Hour)	Seasonal Adjustment to May Figures to Reflect Harvest Conditions	Total Harvest Traffic (Vehicles Per Hour)	Average Annual No. Vehicles Per Hour	Average No. Vehicles Per Year
Friday Peak	1,545	3%	1,591	1,568	572,383.88
Saturday Peak	1,245	3%	1,282	1,264	461,241
Average	1,395	3%	1,437	1,416	516,813

Existing Vehicle Traffic at Mountain Peak Site					
	January 2015 Two-Way Traffic Counts Taken Near MPW Site (Average of 4 days Count)	Seasonal Adjustment to January Figures to Reflect Harvest Conditions	Total Harvest Traffic (Vehicles Per Hour)	Average Annual No. Vehicles Per Hour	Average No. Vehicles Per Year
Peak	432	17%	505	469	171,083
Off-Peak	432	10%	475	454	165,564
Average	432	14%	490.32	461.16	168,323

Increase to Traffic at Intersection of Silverado Trail With Addition of MPW Traffic				
	Average No. Vehicles Per Year	Average # Vehicles Added Annually as Proposed by Mountain Peak During Normal Operation	Total Average No. Vehicles at ST/SCR Intersection w/ Addition of MPW Traffic	Percentage Increase to Current Traffic Volume
Friday Peak	572,384	41,610	613,994	7%
Saturday Peak	461,241	41,610	502,851	9%
Average	516,813	41,610	558,423	8%

Increase to Traffic Near MPW Proposed Winery Site				
	Average No. Vehicles Per Year	Average # Vehicles Added Annually as Proposed by Mountain Peak During Normal Operation	Total Average No. Vehicles at ST/SCR Intersection w/ Addition of MPW Traffic	Percentage Increase to Current Traffic Volume
Peak	171,083	41,610	212,693	24%
Off-Peak	165,564	41,610	207,174	25%
Average	168,323	41,610	209,933	25%

*To calculate the traffic for the 125 person marketing event, numbers were plugged into the "Largest Marketing Event - Additional Traffic" formulas provided in Mountain Peak's "Winery Traffic Information/Trip Generation Sheet." Assumptions: 14 staff would be needed for a total of 28 trips, and 6 event truck trips for a total of 12 trips; the same formula 125/2.8x2 was applied for visitors, amounting to 89 visitor trips.

EXHIBIT “16”

EXHIBIT “16”

EXHIBIT “16”

Grassi Family Winery Visitation & Traffic Figures

Winery visitation		
Maximum Weekly Visitation	70	3640
Marketing Visitation		155
Total Visitation		3795
Traffic Generation*		
One-Way Trips		
Week day Trips	21.5	5590
Typical Saturday (42 Saturdays)	14	588
Crush Saturday (10 Saturdays)	61.5	615
Marketing Trips		68
		6,861
		13,722

one-way trips
two-way trips

*Note: Project Application does NOT account for Sunday traffic

Date: January 30, 2017

Data Comiled by: Anthony Arger, JD, MBA

Source: Grassi Family Winery Negative Declaration & Permit Application

EXHIBIT “17”

EXHIBIT “17”

EXHIBIT “17”

Vineyard Worker & Winery Visitor Traffic on Soda Canyon Road & Silverado Trail

Soda Canyon Road Vineyard Worker Visit Calculations

Average Number of Vineyard Worker Visits to Farm 20 Acres of Vineyards on Soda Canyon Road Per Year		400
Average Number of Vineyard Worker Visits to Farm 1 Acre of Vineyard on Soda Canyon Road Per Year (400 workers/20 acres)		20
Year	No. Acres Existing	Total Worker Visits (20 worker visits x No. Acres)
1998	1,225	24,500
2010	1,956	39,120
2015	2,072	41,440
	(1,125 + 731 acres planted since 1998)	
	(1,956 + 116 acres planted since 2010)	

Accessed by Soda Canyon Road: Winery Visitors

Year	Winery Visitors Permitted
1999	5,772
2015	15,614
Proposed Visitors: Grassi, MPW, & Relic	
	22,828
Total Future/Pending (Existing + Relic, MPV, Grassi Proposed)	
	38,442

Accessed by Silverado Trail at Intersection with Soda Canyon Road: Winery Visitors

Year	Winery Visitors Permitted
1999	18,200
2015	21,940
Proposed Visitors: Beau Vigne, Corona, Reynolds Expansion, Sam Jasper	
	46,856
Total Future/Pending (Existing + BV, Corona, Reynolds, Sam Jasper Proposed)	
	68,796

Combined Vineyard Worker & Winery Visitors at Intersection of Silverado Trail & Soda Canyon Road

Year	Vineyard Worker Traffic & Winery Visitors
1999	48,472
2015	78,994
Existing Vnyd Workers + Existing Winery Visitors + ALL Proposed Winery Visitors	
	148,678
Increase from 2015 Traffic to Future Total if All Approved (as a percentage)	
	88%
Increase from 1999 Traffic to Future Total if All Approved (as a percentage)	
	207%

Date: December 15, 2016
 Acreage & Winery Visitors Compiled by: Amber Manfree, PhD
 Worker Visits/Acre/Year Compiled by: Anthony Arger, JD, MBA
 (Sources: Napa County Winery Database, Napa County Documents, Aerial Photos, & Soda Canyon Road Vineyard Financials)

EXHIBIT “18”

EXHIBIT “18”

EXHIBIT “18”