

**DAVID B. GILBRETH**  
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January 14, 2020

Charlene Gallina, Supervising Planner  
Napa County Planning  
1195 Third Street, 2<sup>nd</sup> Floor  
Napa, CA 94559

Re: Shadybrook Estate Winery and Rapp Equestrian Center

Dear Ms. Gallina:

As you know, I am an attorney representing the Shadybrook Estate Winery and the Rapp Equestrian Center regarding the respective Use Permit Applications that were initially heard by the Napa County Planning Commission on December 4<sup>th</sup>, 2019 and are now continued to January 15, 2020.

The purpose of this letter is to continue to work with the neighbors and respond to the January 13, 2020 letter from Mr. Devore regarding the owners at 17 Chateau Lane.

Essentially, my clients own two easements over Chateau Lane, both of which are unrestricted. One easement, 56 feet wide, provides unrestricted access to the Shadybrook Estate Winery (APN: 052-170-019) and the Rapp Equestrian Center (APN: 052-170-018). The second easement, 40 feet wide, provides unrestricted access to the Rapp Equestrian Center (APN: 052-170-018).

As you know, quite some time ago, in the spirit of good neighbors, my clients proposed restrictive conditions in both Use Permits for both easements.

To be clear, here are the proposed restrictive conditions in both Use Permits for both easements:

The restrictive conditions in both Use Permits for both easements would not allow any commercial uses for the Shadybrook Estate Winery and Rapp Equestrian Center with the exceptions of (1) the installation, replacement, maintenance and repair of the jointly utilized water system (tanks, pipes and wires, etc.); (2) horseback riding anywhere on the Shadybrook Estate Winery property including adjacent to Chateau Lane but not on Chateau Lane; (3) parking of no more than four horse trailers on the east side of the proposed new barn provided the horse trailers are used to evacuate horses in the event of an emergency; and (4) agricultural purposes, including but not limited to, movement of agricultural equipment utilized anywhere on the Shadybrook Estate Winery.

The restrictive conditions in both Use Permits for both easements for any and all other non-commercial uses, including but not limited to, access to the residences would not be restricted.

Letter from David B. Gilbreth

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My clients believe that these proposed restrictive conditions are reasonable, and will not interfere with our neighbors' use of Chateau Lane.

Best regards,

David B. Gilbreth

cc: Alice and David Alkossar

Brian Bordona ([brian.bordona@countyofnapa.org](mailto:brian.bordona@countyofnapa.org))

Joshua S. Devore, ([jdevore@dpf-law.com](mailto:jdevore@dpf-law.com))

**From:** [David Gilbreth](#)  
**To:** [Gallina, Charlene](#)  
**Cc:** [Bordona, Brian](#); [jdevore@dpf-law.com](mailto:jdevore@dpf-law.com)  
**Subject:** Shadybrook Estate Winery and Rapp Equestrian Center  
**Date:** Tuesday, January 14, 2020 4:33:56 PM  
**Attachments:** [Alkossier Ltr to PC 1 14 2020.pdf](#)

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Hi Charlene,

Attached is Mr. Gilbreth's letter response to the recent July 13, 2020 letter from Mr. Devore.

Thank you and best regards,

Hilary Wardlaw  
Assistant to David B. Gilbreth