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Date: Wednesday, Dec 18, 2019, 8:02 AM
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Cc: Morrison, David <David.Morrison@countyofnapa.org>
Subject: Use Permit Streamlining Ordinance Comment

Dear Commissioners,

I have reviewed the draft Use Permit Streamlining Ordinance and am requesting that you consider greater allowances for new or expanded caves. This recommended change is also consistent with the APAC recommendations and the County's CEQA Class 3 Categorical Exemption and therefore, absent unusual circumstances, would not result in any significant environmental impacts. My comment is as follows:

- NCC 18.124.130(C) lists the types of projects that can be approved as minor modifications by the Zoning Administrator. This section limits any increases in building footprints (including caves) to a maximum of 25%. Allowing for the new construction or expansion of caves up to an additional 5,000 square feet with all excavated cave spoils used onsite is consistent with the Board of Supervisors Approved Recommendations from the Agricultural Protection Advisory Committee (APAC) and the County's CEQA Class 3 Categorical Exemption. Many wineries rely on caves as both an environmentally friendly and cost effective alternative to traditional buildings that have much greater visual and environmental impacts than caves. These benefits have long been recognized by the County as evidenced by the County's own CEQA exemption and the Board approved APAC recommendations and should be included in the ordinance.

Thank you for considering my comment.

Regards,

THOMAS S. ADAMS, ESQ.
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