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Agenda Date: 8/11/2020
Agenda Placement: 9D
Set Time: 10:00 AM PUBLIC HEARING
Estimated Report Time: 1 Hour

NAPA COUNTY BOARD OF SUPERVISORS Board Agenda Letter

TO: Board of Supervisors
FROM: David Morrison - Director
Planning, Building and Environmental Services
REPORT BY: Charlene Gallina, SUPERVISING PLANNER - 299-1355
SUBJECT: Cain Vineyard Appeal Hearing

RECOMMENDATION

Consideration and possible action regarding an appeal filed by Andrea Matarazzo, Pioneer Law Group, LLP on behalf of Cain Cellars, Inc., dba Cain Vineyard & Winery (Cain, Cain Winery or the Winery) to a decision by the Director of the PBES Department on July 23, 2019 regarding Status Determination No. P19-00114-SD, which recognized certain operational entitlements for the Cain Winery located at 3800 Langtry Road, St Helena; (Assessor's Parcel No. 027-010-030). The Winery is located on a 492-acre property and has a zoning designation of Agricultural Watershed (AW) and a General Plan Land Use Designation of Agriculture, Watershed and Open Space (AWOS).

(CONTINUED FROM NOVEMBER 19, 2019, JANUARY 14, 2020, MARCH 10, 2020, AND JUNE 23, 2020)

ENVIRONMENTAL DETERMINATION: The PBES Director's issuance of a Status Determination is a ministerial action, which is exempt from CEQA (14 CCR Section 15268).

EXECUTIVE SUMMARY

All documents associated with the Cain Winery Status Determination P19-00114-SD including the Appeal packet can be accessed online at: <https://pbes.cloud/index.php/s/QSwnoSPykWq7QAe>

The matter before the Board involves an applicant appeal of the PBES Director's issuance of Status Determination P19-00114-SD, which recognized certain operational entitlements for the Cain Winery. Appellant asserts that the Director's Status Determination was based on a narrow interpretation of the permit and supporting documentation, and that the decision failed to recognize some of the Winery's historic existing uses. The Winery is located in St. Helena near the Napa/Sonoma County Line within the Agricultural Watershed (AW) zoning district.

The Cain Winery is located on a 492-acre property within the Spring Mountain AVA District of the Western Mountain region of Napa County. The area is moderate to steeply sloping (15-20%), located on a northwest trending ridge bounded on the southwest by a broad drainage swale located near the terminus of Langtry Road five+/- miles west of the City of St. Helena near the Napa/Sonoma County Line. Langtry Road is designated as a public road up to 3747 Langtry Road (APN 022-140-040), the home of the Flying Lady Winery (formerly Smith Family Winery Use Permit #98389-UP approved in 1999). Thereafter, Langtry Road is designated as a private access drive to Cain Winery's entrance and beyond. The private drive is shared with four parcels that include a winery, four residential units, and the "Be Here Resort" approved by Sonoma County in 2014. The surrounding area consists of existing vineyards, grazing land, and rural residential uses to the north, south, east and west.

Pursuant to the County's appeals ordinance (Napa County Code Chapter 2.88), a public hearing on the appeal must be scheduled not less than 15 days nor more than 90 calendar days from submittal of an appeal. To accommodate the Appellant's and Staff's schedules, the hearing was opened on November 19th and continued to January 14, 2020. The hearing was subsequently continued on January 14th to March 10th, on March 10th to June 23rd, and on June 23rd to August 11, 2020. The hearing was continued in part pending the Board's adoption of the Small Winery Protection and Use Permit Streamlining Ordinance No. 1455 (the Small Winery and Streamlining Ordinance) and to evaluate whether Cain Winery qualified under the new streamlined regulations.

Because status determinations are ministerial decisions, the appeal is limited to a review of the record and the decision may be overturned only upon a finding of an erroneous factual determination or processing error. Because there was no hearing or recording of the Director's decision, the hearing on the appeal will be de novo.

PROCEDURAL REQUIREMENTS

1. Chair introduces item and invites disclosures from Board members.
2. Chair invites Staff Report presentation.
3. Chair opens the public hearing and invites testimony from Appellant and Appellant's witnesses as previously disclosed on the witness list and in the order noted on the witness list attached as **Attachment 2**.
4. Chair invites any other interested members of the public to testify regarding the Appeal.
5. Chair then invites Appellant to have final rebuttal.
6. Chair closes the public hearing.
7. A motion of intent is made and seconded to deny, uphold, and/or remand the appeal.
8. Chair refers the matter to County Counsel's office for preparation of a Resolution of Findings and Decision and the Board directs County Counsel's office to return to the Board on September 15, 2020 @10:15 a.m. with the proposed Resolution for the Board's consideration and adoption.

FISCAL & STRATEGIC PLAN IMPACT

Is there a Fiscal Impact? No
County Strategic Plan pillar addressed: Effective and Open Government

ENVIRONMENTAL IMPACT

The PBES Director's issuance of a Status Determination is a ministerial action, which is exempt from CEQA (14 CCR Section 15268).

BACKGROUND AND DISCUSSION

As part of the Code Compliance program established by Board of Supervisors Resolution No. 2018-164, property owners were invited to voluntarily initiate a status review by County Staff to determine the extent of their existing entitlements and/or permissible uses of their property. The purpose of such status determinations is solely to document and/or delineate existing property rights already granted by the County. Status determinations are not permits and do not authorize new uses or structures. They also do not authorize or grandfather historic uses or structures that were not legally established. Status determinations are ministerial decisions and are not subject to the California Environmental Quality Act (CEQA). Furthermore, they do not require a public hearing and an appeal of a status determination may only be filed by the Applicant.

On March 26, 2019, Cain Winery submitted Status Determination Application No. P19-00114-SD. Cain Winery asserted that Use Permit U-528081 issued in 1981 (the 1981 Use Permit), use permit application and supporting documentation established the following legal entitlements:

- Very limited visitation by appointment only in groups of no more than four people per day (averaging 20 visitors per week) to experience educational vineyard walks and see where their wine grows. Cain has no tasting room and visitor appointments are focused – like the winery itself – on the winegrowing process.
 - Marketing events limited to two pick-up days (less than 100 guests each) per year and four private client educational events (less than 20 guests each) per year.
 - The vast majority of Cain's wines (approximately 90%) are distributed through the wholesale system, online, and through allocations. Only about 10% of Cain's wines sales are made directly to customers who visit the Winery by appointment.
 - Total maximum annual visitation of 1,622 (**Attachment 3**).

Cain Winery asserts that the 1981 Use Permit allows visitation by appointment of approximately 1600 visitors per year [two one-way trips x 2.6 people x 6 days of operation per week x 52 weeks = 1622.4]. According to the Declaration of General Manager/Wine Grower Christopher Howell, since 1991 Cain Winery's actual visitation averages approximately two visits per day (two vehicles per day), totaling five visitors per day/20 per week, which Cain contends is within the scope of the permitted amount and therefore in compliance with the 1981 Use Permit. (**Attachment 4**). Cain views this as a showing of compliance with the permit terms that anticipate 5.2 visitors per day/31.2 visitors per week and approximately 1600 visitors per year. (**Attachments 3 and 7**).

On July 22, 2020, Cain Winery's counsel submitted a letter providing supplemental information regarding the basis of its Appeal (**Attachment 7**).

Status determinations look at all aspects of the entitlement, and not just those issues raised by the Applicant. In reviewing Cain Winery's Status Determination request and the supplemental information submitted, the Planning Division and County Counsel's office researched the property's discretionary and ministerial files to provide a historical assessment of the property's existing legal entitlements as granted by the County. The Status Determination analyzes all aspects of the entitlement, and is not limited to only those items raised by the Applicant. Based upon this historical review of County records, Staff determined that Cain Winery has the following operational entitlements:

- Wine production: 59,000 gallons per year.
- A winery building totaling: 26,220 square feet consisting of 22,496 square feet of Main Floor/Winery and 3,274 square feet of Upper Areas (entry/office/hospitality) plus 1,890 square feet of decks and terraces.
 - Visitation: Five (5) visitors per week by appointment only. No public tours and tastings.
 - Parking: Ten (10) spaces for the Winery.
 - Hours of Operation: 7:00 am – 6:00 pm; Six (6) days per week (non-harvest) and seven (7) days per week during harvest.

- Employees: Four (4) full-time; three (3) part-time.
- A Farm Labor Dwelling: 1,296 square feet with two (2) parking spaces.

County Staff relied on the 1981 Use Permit including in the Supplemental Information Sheet, which specifically identified these operational characteristics in connection with the Winery, the Use Permit Application, five building permits, and Meeting Minutes from the Planning Commission's approval of the 1981 Use Permit to determine the scope of Cain Winery's operational entitlements (**Attachments 8-13**). There are no records or permits in the County's files expressly documenting that visitation by appointment in groups of no more than four (averaging 20 visitors per week), marketing events of two pick up days (less than 100 guests each), and four private educational events (less than 20 guests) per year were expressly authorized by the County for the Cain Winery.

Because there are no records in the County's files that expressly support Cain Winery's assertion that these activities were approved, staff informed Cain that Staff lacked authority to authorize any increase or expansion in entitlements beyond what is expressly identified in County permits or documentation. In the Status Determination Decision letter issued on July 23, 2019, Cain was advised based upon the current regulations at the time that the activities the Winery sought to have recognized required processing of a Major Modification to the 1981 Use Permit to request recognition and/or to intensify any winery operations. The deadline for submittal of a substantially complete use permit modification application was November 18, 2019. However, pursuant to Board of Supervisors Resolution No. 2019-130, the deadline was extended to June 3, 2020, which was 90 days from the effective date of the Small Winery and Streamlining Ordinance.

Small Winery Protection and Use Permit Streamlining Ordinance and Cain Winery:

On February 4, 2020, the Board of Supervisors adopted the Small Winery and Streamlining Ordinance amending the Zoning Code to provide a more efficient process for existing entitled small wineries, modifying certain existing winery use permits, and modifying projects within the Napa Valley Business Park. Under this new ordinance, an existing winery with a use permit such as the Cain Winery seeking to expand winery structures or infrastructure, increase employees, visitation and/or marketing event activities may be processed through a Use Permit Major Modification or a Use Permit Minor Modification dependent upon meeting required provisions set forth under each modification category with regards to vehicular trips generated by existing and proposed uses at the winery and the amount of visitation and marketing events requested. This Ordinance became effective on March 5, 2020.

Given these new provisions, in February and March 2020, Cain explored with Staff whether the Winery would qualify under the new Use Permit Minor Modification process for a minor expansion to their visitation to recognize the level of activity requested in their Appeal. On February 26, 2020, Planning, Engineering and CalFire staff conducted a site visit to the Winery to discuss application of the Small Winery and Streamlining Ordinance and the recently adopted 2020 Napa County Roads and Street Standards (RSS) (Resolution No. 2020-12) also adopted by the Board of Supervisors on February 4, 2020. At this site visit, staff conducted a cursory review of the private access road from Langtry Road to the Winery building.

For purposes of processing a Minor Modification under the new Ordinance, it appears that all of the uses on the Cain property from the Winery and farm labor dwelling would not exceed the 40 average daily trips (ADT) threshold. (Cain Winery would need to submit a Trip Generation Worksheet for County Staff to confirm the ADT.) However even if the Cain Winery meets the Minor Modification criteria, compliance with the Road and Street Standards (RSS) would still be triggered. Per Section 2 (c) of the RSS, if the ADT along the private access road to the Winery exceeds 40 trips from all existing and proposed uses, the project is subject to the RSS. Based upon the existing uses (Cain Winery, four residential units, and the "Be Here Resort") that are utilizing the private access road (Langtry Road), Staff determined that existing and proposed average daily trips to the Winery would far exceed the 40 ADT threshold and the RSS would apply. The existing daily trips on Langtry Road alone well exceed 40 ADT. It was also discussed that any proposed expansion by Cain Winery would trigger compliance with the County RSS requirements, which would consist of widening of the private drive to a commercial standard from the end of

Langtry Road to the Winery, and possibly the need for a RSS exception request if the required improvement could not be achieved.

Code Compliance:

To date, there are no code violations on file for this property. However, further Staff research on the property records to ascertain whether or not marketing events were authorized for the property revealed back on September 21, 1988, the Planning Division had notified Cain Winery that a planned fund-raising event to be held on September 25, 1988 had not received approval by the Department under the Board of Supervisor's Limited Social Events Policy in effect at the time. In response, Ms. Joyce Cain on September 28, 1988 informed the Director that such event did not take place and indicated that they would abide by such policy in the future (**Attachment 14**).

Appeal:

On August 20, 2019, a timely appeal packet was filed by Cain Winery to the Director's Status Determination No. P19-00114-SD. According to County Code Section 2.88.030 (B), because status determinations are ministerial decisions, the Appeal is limited to a review of the record and the decision may be overturned only upon a finding of an erroneous factual determination or processing error. Because there was no hearing or recording of the PBES Director's decision, the hearing on the Appeal will be de novo (e.g., a new hearing) as stated in County Code Section 2.88.090 (A).

Pursuant to the County's appeals ordinance (County Code Chapter 2.88), a public hearing on the Appeal must be scheduled not less than 15 days nor more than 90 calendar days from submittal of an appeal. To accommodate Appellant's and Staff's schedules, the hearing was opened on November 19th and continued to January 14, 2020. The hearing was subsequently continued on January 14th to March 10th, and on March 10th to June 23rd and then on June 23rd to August 11, 2020.

GROUND OF APPEAL:

The following outlines the basis of the Appeal as contained in Appellant's Appeal dated August 19, 2019 (**See Attachment 1**). For convenience, Staff has provided a summary below, but recommends the Board review the actual Appeal for details.

Appeal Ground No. 1: Cain Winery asserts that the intensity of operations and its development footprint have remained constant since completion of the last permitted structure in the 1980s. Supporting documentation submitted with Cain Winery's Status Determination Application shows that the existing uses are within the terms of the 1981 Use Permit.

Staff Response: The purpose of the status determination process is to allow any property owner and/or permittee to voluntarily submit an application and initiate a review by County Staff to confirm the scope and extent of their existing legal entitlements and/or permissible uses of their property. It is solely to document and/or delineate existing property rights, and not to reduce or affect established entitlements. Likewise, status determinations do not authorize, permit, modify or expand any land uses, but merely confirm existing legal entitlements already granted by the County. Furthermore, status determinations do not authorize new uses or structures and do not authorize or grandfather historic uses or structures that were not legally established. Applicants desiring a determination on the legality of nonconforming historic structures or uses would need to apply for a Certificate of Present Extent of Legal Nonconformity pursuant to County Code Section 18.132.050.

In review of Cain Winery's entitlements, Staff evaluated County records on file associated with the Use Permit as approved by the Planning Commission on September 16, 1981, which consisted of a request for a new 59,000 gallon/year and a farm labor dwelling, as well as information provided by Cain Winery as a part of the Status

Determination. This information included the issued 1981 Use Permit approval letter with Conditions of Approval; the adopted Negative Declaration prepared for the Project; the Planning Commission Staff Report and Meeting Minutes from the Planning Commission September 16, 1981 Meeting; and the Use Permit Supplemental Application Sheet and Project plans. Staff also reviewed prior building permits issued and approved plans to ensure that the Winery approval had been “used” and was in compliance with Project conditions (**Attachments 9-13**). From all this information, Staff was able to ascertain the existing legal entitlements related to the Winery as noted above and the Director's Status Determination Decision letter (**Attachment 8**).

Staff also reviewed and considered the additional information Cain submitted with the Status Determination application of existing operations to date. However, Staff determined that such information was not germane for a determination of prior legal entitlements because the information focused on winery operations that had occurred within the past year, including: a summary of Alcoholic Beverage Control (ABC) licensing, a rezoning of the property that occurred in the 1970s in order to apply for an agricultural preserve contract, and Agricultural Preserve Contracts and Erosion Control Plans previously authorized for the property. Because this information was limited to recent activities, it did not provide any support for Cain Winery's assertions regarding the status of legally entitled operations approved in 1981.

Appeal Ground No. 2: Cain contends that the Winery is not open to the public for tours and tastings, and receives visitors by appointment only, averaging 20 visitors per week to walk the vineyard. Cain asserts that marketing events are limited to two pick-up days (less than 100 guests each) per year and four private client educational events (less than 20 guests each) annually.

Staff Response: The 1981 Use Permit and the Use Permit Application Supplemental Information Sheet identified no tours and public tastings would occur at the proposed winery and that the anticipated visitors to the Winery would only be “+/- five per week.” It should be noted that when Mr. Cain completed the application materials for the 1981 Use Permit, the application did not indicate that food service was going to be provided at the Winery, as well as, marketing events. The number of “deliveries or pick-ups were identified as two per day or 10 per week” (**Attachment 9**). Staff interpreted this specific information to refer to winery deliveries and pick-up of supplies and case goods and not as visitation or marketing activities.

Testimony documented in the 1981 Planning Commission Meeting Minutes from Jerry Cain, the Applicant, provided the following sworn testimony: “... [The Winery] may have visitors to have dinner and taste wine. However, they will have no tours or tasting. The public would not be invited. He [Jerry Cain] said the winery is in a remote location and the entrance to the winery is in Sonoma County...” The Meeting Minutes further reflect that during Commission deliberations, Commissioner Crundall indicated that he had received two phone calls from the public regarding potential traffic concerns. In response, Commissioner Crundall informed the Commission that visitation at the Winery would result in two trips per day (**Attachment 11**).

Status determinations are limited to identifying previous legal entitlements authorized by the County and not the recognition of existing operations at the Winery. There are no records in the County's files that expressly support public tours and tastings or marketing events at Cain Winery.

Appeal Ground No. 3: Cain contends that the 1981 Use Permit estimated visitation by appointment in the application at +/- 5 vehicles per week and that five (5) customer parking spaces were identified. Cain asserts that the September 1981 hearing testimony of Jerry and Joyce Cain and corresponding Meeting Minutes of the Planning Commission confirm approved visitation by appointment of two one-way trips per day. On the basis of the County's Winery Definition Ordinance (WDO) Sections 12070 (now Section 18.08.620 - Tours and Tastings) and 12071 (now Section 18.08.370 - Marketing of Wine), information in the existing 1981 Use Permit and Conditions of Approval, the Application for the 1981 Use Permit, and hearing testimony associated with the County's unanimous approval, Cain has calculated its permitted visitation by appointment to be approximately 1600 visitors per year [two one-way trips x 2.6 people x 6 days of operation per week x 52 weeks = 1622.4].

Staff Response: Staff agrees that the Commission acknowledged that visitation at the Winery would only result in two trips per day. However, in Staff's opinion this statement did not imply that the Winery could have more visitation than identified in the application materials, which was anticipated to be five per week. Furthermore, the Meeting Minutes reflect that Jerry Cain testified that "they [the Winery] will have no tours or tastings. The public would not be invited." and that "the [W]inery is in a remote location and the entrance to the winery is in Sonoma County..." (**Attachment 11**). Status determinations are limited to identifying previous legal entitlements authorized by the County and not a recognition of existing or historic operations. There are no records in the County's files that expressly support public tours and tastings at Cain Winery.

It should be also noted that a total of 22 parking spaces were proposed in the Supplemental Information Sheet with seven reserved for employees, 10+ equipment parking and five customer parking. However, the Project approval letter and conditions of approval indicated "a minimum of 10 off-street parking be provided for the Winery and a minimum of two parking spaces for the farm labor dwelling" (**Attachment 12**). This amount of parking supports Staff's interpretation that visitation at the Winery was limited to the amount visitors anticipated for the Winery at the time, which was five per week.

Appeal Ground No. 4: Cain asserts that water for the Cain Winery is supplied by wells, and both process wastewater and sanitary wastewater are treated via septic tanks and leach field in accordance with Cain's application and the 1981 Use Permit. According to Cain, the water supply and sanitation systems are regularly maintained and have served their permitted purposes for decades without incident.

Staff Response: At the time of Planning Commission approved the 1981 Use Permit, the following information was identified by the Applicant on the Supplemental Information Sheet (**Attachment 9**): domestic and industrial waste disposal would be provided for the Winery by a septic tank and leach lines; 100 gallons of domestic waste would be produced per day; and 150,000 gallons of industrial waste would be produced per year. As for water supply, a 10,000-gallon holding tank and a 10,000-gallon emergency water storage tank would be provided on-site. It was stated in the application that the property's ground water well tested at 35 gallons per minute, but it was not identified how much ground water would be used by the Winery per year.

The Environmental Health Division (EH) reviewed the septic system permit records and also concluded that the Winery's authorized visitation appeared negligible. According to EH records, the wastewater system was permitted and installed in 1982. The EH records reveal that there were not any calculations indicating how the system was sized, but back then the County used a 60 day harvest period, which would have required a wastewater system sized for 1,475 gallons per day (gpd). The permit indicates it was sized for 1,450 gpd. EH confirmed that a tank for domestic wastewater was installed, but the flows may have been considered negligible since it was only four employees and five visitors per week, which is about 95 gpd if all five visitors came on the same day. The size of the leach field that was installed was not oversized.

As for ground water use, because a public water system was not required in the 1981 Use Permit, the number of people served (employees, visitors, residents) must have been less than 25 daily. EH also confirmed that a well was drilled in late 1980 with a yield of 35 gallons per minute, which met the County's minimum requirements for a yield test at that time. In addition, the EH records confirm that the Winery has never requested a food permit for any visitation activities at the time, or for Winery operations to date.

There is no information to dispute Cain Winery's assertion that water and wastewater systems are maintained and have operated without incident. However, there is also no information regarding the capacity of these systems or how they have been historically regulated to support Cain Winery's request in the Status Determination for additional visitation and marketing events.

Appeal Ground No. 5: Cain asserts that its annual visitation is far less than the permitted 1600. Records that Cain submitted with the Status Determination application demonstrate that visitation by appointment for the 12-month

period beginning March 1, 2018 and ending February 28, 2019 was 1088 total visitors.

Staff Response: As set forth above in Staff Response to Appeal Ground No. 3, Staff's review of the property's existing legal entitlements previously granted by the County revealed that only five (5) visitors per week by appointment were authorized by the Planning Commission. This equates to 260 visitors per year. As noted in the 1981 Use Permit application materials, the proposed winery operator at the time (Jerry Cain) did not request tours and public tastings and none appear to have been authorized. It is Staff's opinion that during this period of time, and given the Winery's remote location, it was likely that appointments would have been scheduled for wine trade only versus members of the general public, and over time this type of clientele likely changed.

In addition, authorization of marketing events was not addressed or noted in the use permit application materials or the Project's approval letter, so Staff concluded that marketing events were not authorized for the property. Research indicated that the proposed winery operator at the time (Jerry Cain) requested that 3,274 square feet be dedicated to the Winery's entry, office and hospitality uses plus 1,890 square feet dedicated to decks and terraces (**Attachment 9**). This would suggest that the operator intended that some form of hospitality operations would be conducted at the Winery, but Staff could not find any records that expressly granted visitation beyond five visitors per week. Cain asserts that they were granted 1,600 visitors per year based upon two trips per day. (Note: two trips is defined as one vehicle visiting the property – a trip in and a trip out.) Staff has calculated that 1,600 visitors would equate to approximately five (5) visitors per day or 30 visitors per week. Based up the County's trip generation calculation sheet used to evaluate current winery projects, five (5) visitors per day would generate four (4) trips on a weekday at 2.6 visitors per vehicle, and four (4) trips on a weekend day at 2.8 visitors per vehicle. Given this assessment, Staff believes that a use permit modification is needed to recognize the current visitation numbers in excess of the five (5) visitors per week recognized by the Status Determination.

Appeal Ground No. 6: Cain asserts that typical employment at the Winery is eleven (11) full-time personnel, except during harvest when Cain has two (2) interns working in the cellar.

Staff Response: The 1981 Use Permit and the Use Permit Application Supplemental Information Sheet, identified one employee shift proposed with seven total employees per shift (four full-time and three part-time) (**Attachment 9**).

Board Considerations and Staff Recommendation:

The following options are provided for the Board's consideration regarding possible action on the Appeals:

- Deny the Appeal in its entirety and uphold the Director's Status Determination. If the Appeal is denied, the Appellant can submit a use permit modification within 120 days to request approval of the activities at the levels Cain Winery asserts have historically occurred.
- Find an erroneous factual determination or a processing error occurred and overturn all or any portion of the Director's Status Determination.
- Remand the matter to the Director with direction.

In Staff's opinion, none of the information provided in the Appeal and/or other materials received to date from Cain substantively challenges or requires modification of the decision reached by the Director regarding this matter. As a result, Staff recommends that the Board deny the Appeal in its entirety and uphold the Director's Status Determination P19-00114-SD.

SUPPORTING DOCUMENTS

A . ATT 1 - Appeal Packet

- B . ATT 2 - Witness List
- C . ATT 3 - Application for Status Determination Letter
- D . ATT 4 - Declaration of Christopher Howell, General Manager/Wine Grower
- E . ATT 5 - Exhibits A-K (1 of 2)
- F . ATT 6 - Exhibit L (2 of 2)
- G . ATT 7 - Appellant's July 22, 2020 Supplemental Letter
- H . ATT 8 - Director's Status Determination Letter - P19-00114-SD
- I . ATT 9 - Use Permit Application & Supplemental Information Sheet - U-528081
- J . ATT 10 - Planning Commission Staff Report & Negative Declaration - U-528081
- K . ATT 11 - Planning Commission Meeting Minutes from 1981
- L . ATT 12 - 1981 Use Permit Approval Letter & Conditions of Approval
- M . ATT 13 - Building & Sewage Permits Information
- N . ATT 14 - Winery Correspondence & Limited Social Policy
- O . ATT 15 - Graphics

CEO Recommendation: Approve

Reviewed By: Helene Franchi