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Agenda Date: 1/22/2020

Agenda Placement: 7A

Napa County Planning Commission Board Agenda Letter

TO: Napa County Planning Commission
FROM: Charlene Gallina for David Morrison - Director
Planning, Building and Environmental Services
REPORT BY: Wyntriss Balcher, Planner II - 707 299-1351
SUBJECT: Caldwell Vineyards Winery Major Modification #P17-00074-MOD

RECOMMENDATION

CALDWELL VINEYARDS, LLC/CALDWELL VINEYARDS WINERY/MAJOR MODIFICATION #P17-00074-MOD AND ROAD & STREET STANDARDS EXCEPTION REQUEST

CEQA Status: Consideration and possible adoption of a Negative Declaration. According to the proposed Negative Declaration the proposed project would not have any potentially significant environmental impacts. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Request: Approval of a Use Permit Modification for an existing winery to allow the following: 1) increase the winery production capacity from 25,000 gallons to 35,000 gallons per year; 2) increase the number of weekly by-appointment visitors; 3) allow for on-site consumption of wines; 4) increase the number of employees; 5) modify by-appointment tasting hours; 6) modify the existing Marketing Plan; 7) construct a permanent crush pad cover and a trellis shade structure; 8) increase the width of portions of the existing roadway; 9) install traffic calming measures on the private portion of Kreuzer Lane; and 10) an Exception to the Napa County Road and Street Standards.

Staff Recommendation: Adopt the Negative Declaration and approve the RSS Exception and Use Permit Modification, as conditioned.

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Applicant Contact: Tom Adams, Esq., (707) 252-7122 or tadams@dpf-law.com

EXECUTIVE SUMMARY

Proposed Actions:**That the Planning Commission:**

1. Adopt the Negative Declaration, based on Findings #1 - #7 (Attachment A);
2. Approve the requested Exception to the Napa County Road and Street Standards based on Findings #8 - #9 of Attachment A and subject to the recommended Conditions of Approval (Attachment B); and
3. Approve Use Permit (P17-00074-MOD), based on Findings #10 - #14 (Attachment A), and subject to the recommended Conditions of Approval (Attachment B).

Discussion:

On December 15, 2004, the Planning Commission approved the Caldwell Winery at 25,000 gallons per year (Use Permit #03318-UP). The conditions of approval included a requirement that all winery activities were to occur within the 16,970 sq. ft. cave (later increased to 18,438 sq. ft. by Use Permit Minor Modification #P07-00039-MODVMIN). A limited visitation and a modest marketing program was also approved.

On February 24, 2017, a use permit modification request was filed to increase the production capacity, expand operations to include necessary outdoor tasks, and to increase visitation and marketing activities. The project was heard and considered by the Commission at three public hearings that occurred during 2018. The adjacent property owners submitted letters and testified at the public hearings in opposition to the project and expressed their concerns with the winery's compliance with existing conditions of approval. The applicant had many discussions with the neighbors and several variations to the project were proposed at the hearings. At the last public hearing before the Commission on October 17, 2018, the applicant presented another modification to the project to the Commission. The Commission expressed a desire to continue the hearing to allow staff time to review the new modifications but the applicant's representative requested that the hearing not be continued and asked for a decision on the project. The Commission denied the project (4:1 - AYES: Gallagher, Whitmer, Cottrell, and Hansen; ABSTAIN: Mazotti).

The applicant appealed the Commission's denial and the appeal hearing was heard by the Board of Supervisors on March 12, 2019. After closing the public hearing, the Board (4:1 - AYES: Gregory, Pedroza, Ramos, and Wagenknecht; NO: Dillon) remanded the project to the Commission with direction to consider the following: 1) a revised application that uses a seasonality approach to add a weekly maximum to visitation numbers; 2) a traffic monitoring program to work in conjunction with a visitor log monitoring program; 3) a phased-in approach to the requested volumes and the appropriateness of the scope of events during high fire season; and, 4) greater notification to neighbors and surrounding parcels for events.

The applicant subsequently revised the project to address the direction of the Board and resubmitted the subject use permit modification application (Use Permit P17-00074) on September 18, 2019. The revised proposal eliminated any expansion of floor area of the winery caves and proposes the following operational changes: an increase in production capacity to 35,000 gallons; an increase in daily and weekly by-appointment visitation; an increase in marketing activities; an increase in the number of employees; a change in visitation hours; removal of provisions regarding custom crush; construction of required road improvements in accordance with the road exception; the installation of acceptable traffic calming measures on the private drive; construction of a cover over the crush pad located outside the cave portal; and the allowance of activities outside of the caves, including clarification of the location of the outdoor deliveries and crush activities.

The proposal has been analyzed for its environmental impacts, which were found to be less than significant. Sufficient grapes and water supplies are available to serve the proposed project. The proposed three additional marketing events per year were found similar to wineries of similar production. The proposal includes voluntary greenhouse gas offset features; the wine production operates predominantly within the existing caves; the

improvements to the receiving/crush outdoor area will provide additional screening and stormwater runoff protection; the project is located in close proximity to its main grape source, and no vineyard removal is proposed. There are no viewshed issues and the project will be subject to the County's expanded housing impact fees.

FISCAL & STRATEGIC PLAN IMPACT

Is there a Fiscal Impact? No

County Strategic Plan pillar addressed:

ENVIRONMENTAL IMPACT

Consideration and possible adoption of a Negative Declaration. According to the proposed Negative Declaration, the proposed project would not have any potentially significant environmental impacts. The project site is not on any of the lists of hazardous waste sites enumerated under Government Code Section 65962.5.

BACKGROUND AND DISCUSSION

Owner/Applicant: Caldwell Vineyards, LLC, 1558 Silverado Trail, Napa, CA 94559

Representative: Thomas Adams, 1455 First Street, Suite 301, Napa, CA 94559, (707) 252-7122, TADAMS@DPF-Law.com

Zoning District: Agricultural Watershed (AW)

General Plan Designation: Agriculture, Watershed & Open Space (AWOS)

Filed: February 24, 2017; **Resubmission:** August 31, 2017; **Complete:** September 11, 2017; **Resubmission:** September 18, 2019; **Resubmission:** October 14, 2019; **Complete:** November 4, 2019

Parcel Size: ±42.96 acres (APN: 045-310-056) and ±40.11 acres (APN: 045-310-056)

Existing Development: There is an existing 25,000 gallon/year winery operating within an existing 18,438 ft² cave, an improved access driveway, an equipment pad and 38 parking spaces on paved and gravel surfaces.

Vineyard Acreage (Existing): ±30.32 acres

Vineyard Acreage (Proposed): no change proposed

Winery Characteristics:

Winery Size (Existing): ±18,438 ft², located within an existing cave

Winery Size (Proposed): no change proposed

Production Capacity (Previously Approved): 25,000 gallons/year

Production Capacity (Proposed): 35,000 gallons/year

Development Area (Existing): 2,813 ft²
Development Area (Proposed): no change proposed

Winery Coverage (Existing): ±39,113 ft²; .90 acres or 2%
Winery Coverage (Proposed): no change proposed
(Maximum 25% or 15 acres)

Accessory/Production Ratio (Existing): 1,468 ft² /16,970 ft²= 9%
Accessory/Production Ratio (Proposed): no change proposed

Number of Employees (Existing): Two (2) full time/one (1) part time
Number of Employees (Proposed): Six (6) full time/six (6) part time

Visitation (Existing): Eight (8) daily visitors by appointment; maximum 40/week
Visitation (Proposed): Maximum 6,250 by-appointment visitors per year. Daily and weekly visitation numbers vary by seasons:

Low Season = January, February, March, December: 25 daily visitors maximum / 84 weekly visitors maximum

Mid Season = May, June, July, August: 35 daily visitors maximum / 106 weekly visitors maximum

High Season = April, September, October, November: 35 daily visitors maximum/ 190 weekly maximum

The winery will be closed for tours/tasting on days when the Marketing Events are scheduled to occur.

Marketing Program (Existing): A total of 13 events: 10 tours, tasting and meal events/year, maximum 10 guests; two (2) release events/year; maximum 60 guests; also, one (1) wine auction event with a maximum 50 guests,
Marketing Program (Proposed): A total of 15 events: 12 "very small" events/year, maximum 28 guests; and three (3) "small" events/year, maximum 68 guests.

All events to occur within the hours of 10:00 am and 10:00 pm, inside the tasting room, the paved area in front of the cave, the trellis shade area east of the cave, and in the gravel parking area below the cave portal.

Total Maximum By-Appointment and Marketing Event Visitors: 6349 visitors per year

Days and Hours of Operation (Existing): 10:00 am to 4:00 pm daily for retail sales, tours and tasting
Days and Hours of Operation (Proposed): 10:00 am to 6:00 pm daily for retail sales, tours and tasting

Parking (Existing): 38 spaces
Parking (Proposed): no change proposed

Setbacks (Required): 300' front, 20' side and rear yards
Setbacks (Existing): ±800'; >300', east side: >175' feet; north side: >±1500' south side
Setbacks (Proposed): no change

Adjacent General Plan Designation/Zoning District/Land Use:

North - AWOS (Agriculture, Watershed & Open Space) General Plan Designation/AW (Agricultural Watershed)

Zoning/vineyards residential

South- AWOS/AW/residential and open space

West- AWOS/AW/agriculture (vineyards) and residential

East - AWOS/AW/ agriculture, residential

Nearby Wineries: (located within 1 mile of the project)

Please refer to Attachment K.

Project History:

In December 2004, the Commission approved the original Use Permit (#03318-UP) to establish the 25,000 gallons per year winery. The approval included a requirement that a minimum of 50% of the total production capacity (12,500) gallons must be processed from grapes grown on the property or in the immediate vicinity of the winery parcel. The "immediate vicinity" was identified as vineyards accessed by driving along Kreuzer Lane and that would otherwise have their grapes removed from this area along the existing private roadway and Kreuzer Lane in the vicinity of the winery parcel. Custom crush activities were also approved for a maximum 10,000 gallons, but at least 5,000 gallons of the custom crush wine was required to be processed from grapes grown from vineyards in the immediate vicinity of the winery parcel. Custom production activities were not permitted to include case goods storage, retail wine sales, offices, wine tasting or distribution/shipping. All winery activities were required to occur within a 16,970 ft² cave; no outdoor winery activities were allowed.

By-appointment retail sales and tours and tasting were approved, with a maximum visitor total of eight (8) persons per day, not to exceed 40 per week. Tours and tastings were to be completed by 4:00 PM and retail sale of wines produced at the property completed by 4:30 PM. A marketing plan was approved for 10 promotional tours, tastings and meal events per year with a maximum of 10 people at each event; two (2) release events per year with a maximum of 60 people at each event; and one (1) wine auction event with a maximum of 50 people. The conditions of approval included a notification requirement of 60 days prior notice to the owners of parcels 045-310-045 and -047 of the two (2) release events and one wine auction event, and prior notification within a reasonable time after the events are scheduled. The conditions of approval also limit reoccurring and scheduled vehicle trips to and from the site by employees, deliveries, and visitors during the PM peak traffic hours (4:00 pm to 6:00 pm, weekdays; 2:00 pm to 4:00 pm weekends) to the maximum extent possible.

On July 3, 2004, the Director approved Use Permit # P07-00039-VMIN to expand the existing winery cave by 1,468 ft² to accommodate winery offices and bathrooms, for a total of ±18,438 ft². The offices are for use exclusively by winery staff and bathrooms for use by both winery staff and visitors.

On February 24, 2017, Use Permit P17-00074-MOD was submitted and requested an increase in production to 35,000 gallons/year; increase in cave area; increase of nine employees; an increase of 52 daily visitors (increase 380 visitors/week); increase of six marketing events; extend visitation and retail sales until 6:00 pm; removal of custom crush conditions; and construction of an outdoor shade trellis for tastings. The project was heard by the Commission on January, 18, 2018, March 7, 2018, and October 17, 2018 and ultimately denied.

The applicant appealed the Commission's denial and the appeal hearing was heard by the Board of Supervisors on March 12, 2019. After closing the public hearing, the Board remanded the project to the Commission with direction to consider the following: 1) a revised application that uses a seasonality approach to add a weekly maximum to visitation numbers; 2) a traffic monitoring program to work in conjunction with a visitor log monitoring program; 3) a phased-in approach to the requested volumes and the appropriateness of the scope of events during high fire season; and, 4) greater notification to neighbors and surrounding parcels for events.

The applicant subsequently revised the project to address the direction of the Board and resubmitted the subject use permit modification application (Use Permit P17-00074). The revised proposal eliminated any expansion of floor area of the winery caves and proposes the following operational changes: an increase in production capacity to 35,000 gallons; an increase in daily and weekly by-appointment visitation; an increase in marketing activities; an increase in the number of employees; a change in visitation hours; removal of provisions regarding custom crush; construction of required road improvements in accordance with the road exception; the installation of acceptable traffic calming measures on the private drive; construction of a cover over the crush pad located outside the cave portal; and the allowance of activities outside of the caves, including clarification of the location of the outdoor deliveries and crush activities.

Code Compliance History:

In prior staff reports, staff previously reported a history of various code compliance violations and a lawsuit; related to the construction of the caves, however, all of those issues were resolved. As noted in one neighbor's letter, there was a winery compliance report presented to the Planning Commission regarding ongoing winery code compliance and enforcement activities. The recommendation was to direct staff to return to the Commission, if those matters were not resolved by July 1, 2010. The matter was not resolved and the County filed a lawsuit on July 1, 2010. A Judgment was filed on June 2, 2011.

Records indicate that the winery requested to be included in the 2012 Wine Audit, at which time they were found to be out of compliance for visitation and production. They continued to be monitored and were found compliant after review of the 2015 documentation. At the time the prior use permit modification application was submitted in February, 2017, the records showed that all issues had been resolved and there were no current notices of violation code cases on file.

On September 16, 2019, the applicant called to report that one of their marketing events had been held, and winery staff failed to send out the required notification to the two neighbors on the private road. Subsequently, complaints were filed with Code Compliance regarding the winery's noncompliance with Use Permit #03318-UP, regarding the use of amplified music outdoors; inadequate screening of the exterior winery equipment with slatted chain link fencing, and the noisy ventilation fans. The complaint also cited failure to display a "by appointment only" on the winery sign, and presented photos of people walking around outside of the caves, watching an activity concerning the placement of barrels outside of the winery caves. The Code Compliance staff has been working with the applicant to resolve these issues. Inasmuch as the project proposes an increase in visitation and to ensure that the winery can control visitation to meet the weekly limitation, staff has included COA 4.20(c) to require the installation of a "Tours and Tastings by Prior Appointment Only" sign within 30 days of the conclusion of the hearing.

Discussion Points:

Hearing History - On October 17, 2018, the Planning Commission held a public hearing to consider the modification to the existing Caldwell Vineyard Winery. A copy of this staff report, the March 7, 2018 staff report, and the January 17, 2018 staff report are provided in Attachments D, E and F, E. The complete staff reports can be found at:

<https://services.countyofnapa.org/AgendaNetDocs/Agendas/PlanningAgenda/10-17-2018/7A.pdf>;
<https://services.countyofnapa.org/AgendaNetDocs/Agendas/PlanningAgenda/3-7-2018/8C.pdf>; and
<https://services.countyofnapa.org/AgendaNetDocs/Agendas/PlanningAgenda/1-17-2018/8A.pdf> .

At the March 7, 2018, the Commission heard testimony, but continued to an unspecified date with direction that the applicant make the following changes to the project: 1) reduce the intensity of visitation; 2) install traffic calming measures on the private portion of Kreuzer Lane; and 3) preserve certain trees located along the private portion of Kreuzer Lane. The Commission also requested accountability of compliance with the original conditions of approval and wanted to see some action toward the installation of safety measures at the intersection of Kreuzer Lane and Fourth Avenue. The applicant contacted the Department of Public Works regarding a request for stop control for eastbound traffic, but not as a part of the pending Caldwell Vineyards Winery Use Permit, but as a community request. The Board of Supervisors approved the installation of the stop sign which was subsequently installed.

On June 7, 2018, the applicant submitted a revised project proposing a reduction of the number of weekly visitors, acceptable traffic calming measures, and additional covering and screening of necessary outdoor production activities. Staff conducted a field inspection to determine the status of the original conditions of approval.

On October 17, 2018 a third hearing was held to discuss the revised project, during which time additional changes to the project was presented to the Commission by the applicant. However, staff did not have sufficient time to review the proposed changes at the hearing. Because the project representative requested that the hearing not be continued, which would have allowed staff time to review the new proposed modifications to the project, the Commission denied the project.

An appeal of the Commission's action was heard by the Board of Supervisors on March 12, 2019. The Board remanded the project back to the Commission, with direction to 1) consider a revised application that uses a seasonality approach to add a weekly maximum to visitation numbers, 2) consider a traffic monitoring program to work in conjunction with a visitor log monitoring program, 3) consider a phased-in approach to the requested volumes and the appropriateness of the scope of events during high fire season, and, 4) consider greater notification to neighbors and surrounding parcels for events. The complete staff report and minutes can be found at:

<https://services.countyofnapa.org/AgendaNetDocs/Agendas/BOS/3-12-2019/9B.pdf> and

http://napa.granicus.com/DocumentViewer.php?file=napa_f944c3355d1a2d1868d8266d07465eca.pdf&view=1

Current Proposal - On October 14, 2019 the applicant submitted a revised project proposing to increase production from 25,000 gallons to 35,000 gallons, with no expansion of the winery facilities, the caves. The existing cave portal (portal #4) is the area utilized for grape reception and crushing. The project proposes the construction of a crush pad cover/trellis over the portal area to provide shade and to comply with the Stormwater Management and Discharge Control Code. The Conditions of Approval (COA) #1 approved by Use Permit #03318-UP stated that the caves serve as the winery, no outdoor winery activities were associated with that application, and no activities are authorized outside the caves. The applicant's current proposal includes a request to revise the condition to allow harvest activities on the pad and to allow outdoor picnicking under a proposed trellis for use by winery employees, drivers waiting for their clients, and Marketing Events. In accordance with State law and the PBES Director's July 17, 2008 memo, "Assembly Bill 2004 (Evans) and the Sale of Wine for Consumption On-Premises", the revised application proposes on-premises consumption of wine produced on-site and purchased from the winery where it may occur solely in the tasting room, in the paved area in front of the cave, under the shade trellis east of the winery cave, and in the gravel area below the winery cave. Finally, the revised application includes a request to provide limited food during wine tasting, which would be prepared offsite and catered for marketing events. Food preparation would take place within the crush pad area during marketing events. The caterer would provide a food preparation station when required.

Use Permit #03318-UP was also conditioned (COA #1) to preclude custom production activities. On April 26, 2005, the Planning Director issued a memorandum that stated Alternating Proprietor (AP) applications would no longer be regulated, inasmuch as custom crush/AP arrangements are essentially business relationships which determine who owns the grapes involved but which do not relate directly to land use or environmental impacts as long as they are conducted within the total production volume of the winery permitted by the use permit. Holders of said permits can apply to the PBES Department for use permit modification to remove this condition, and this request has been made.

At their March 12, 2019 hearing, the Board directed the applicant to consider a revised application that uses a seasonality approach to add a weekly maximum to visitation numbers. As such, the project now proposes to use three seasonal categories as outlined above and proposes a 6349 limit on the maximum number of visitors per year (including marketing visitors). These changes make the project more consistent with the average and median numbers of similar wineries in the vicinity (see Winery Comparison charts, Attachment K). Marketing events will be increased by three (3) events per year, with the largest event totaling no greater than 68 guests. Since the winery will be closed on days the marketing events would occur, an additional 99 annual visitors to the winery would occur, resulting in a total annual visitation of 6,349. This number is closer to the median annual visitation numbers.

In addition, the Board directed the applicant to consider a traffic monitoring program to work in conjunction with a visitor log monitoring program. The project now proposes the maintenance of a tour/tasting visitor log book to track annual visitation totals for one year, and submitted to PBES on a monthly basis. In addition, the project now proposes to hold annual meetings for the next two years with neighbors in June to discuss concerns. Finally, the project proposes the winery will provide 30-days advance notice to neighbors who reside on the private portion of Kreuzer Lane (behind the gate) for Small Events (68 guests max). The notice will include the cell phone number of a contact person who will be on site during event to address any issues that may arise.

Road and Street Standards (RSS) Exception - The project is required to bring the access road and driveway to current Napa County Road and Street Standards (NCRSS), specifically to increase the width of the roads, and all Fire Department required access shall comply with the NCRSS. A request has been presented for an exception for a reduction in width to the commercial standards for a stretch of the access driveway due to existing topographical features, trees, steep slopes, and setback from the natural water course as allowed by NCRSS Section 3, (d)i and (d)ii. The Engineering Division staff has reviewed the request with the applicant's authorized agents and the Fire Marshal's office. The granting of the exception in width to the commercial roadway standards from STA 30+55 to STA 37+35 is based upon constraints from existing constraints and the improvements proposed achieves the same overall practical effect of the NCRSS by providing defensible space and consideration toward life, safety and public welfare by providing horizontal and vertical vegetation management along the entire length of the private lane and around any existing and proposed structures to create defensible space. Improvements to the existing private lane brings the majority of the road into compliance with the NCRSS with the exception of the 680 foot section for access which will have a varied roadway width between 14-20 feet. The project is located in a moderate fire hazard area, and the Fire Department has recommended conditions that will achieve the same overall practical effect as the standards included in the NCRSS. The winery is located in a moderate fire hazard area. To address the Board's comment and direction regarding the appropriateness of the scope of events during what has been historically considered high fire season, the number of weekly visitors and marketing guests have been decreased and the winery developed a Fire Evacuation Plan with primary and secondary emergency exit routes. An adjacent vineyard owner has agreed to the use of a secondary route through their property.

Based upon a comment from a neighbor located on the private portion of Kreuzer Lane, regarding safety concerns of vehicular speed down the steep grade from the winery driveway, the application includes a proposal to install the traffic calming measures of posted speed limit signs and mumble strips (more quiet than rumble strips) in two areas of the private portion of Kreuzer Lane.

Decision Making Options:

As noted in the Executive Summary Section above, staff is recommending approval of the project with conditions of approval as described in Option 1 below. Decision making options also include a reduced visitation/marketing alternative and no project alternative.

Option 1 - Approve Applicant's Proposal (Staff Recommendation)

Disposition - Primary operational changes resulting from this option would be an increase in production capacity to 35,000 gallons, an increase in daily and weekly visitation, an increase in marketing activities, an increase in the number of employees, a change in visitation hours, removal of the provisions regarding custom crush, the construction of required road improvement in accordance with the road exception, the installation of acceptable traffic calming measures on the private drive, the clarification of the location of the outdoor deliveries and crush activities, and the construction of a cover over the crush pad located outside the cave portal. This proposal has been analyzed for its environmental impacts, which were found to be less than significant. Sufficient grapes and water supplies are available to serve the proposed project. The proposed three additional marketing events per year were found similar to wineries of similar production. The proposal includes voluntary greenhouse gas offset features; the wine production operates predominantly within the existing caves; the improvements to the

receiving/crush outdoor area will provide additional screening and stormwater runoff protection; the project is located in close proximity to its main grape source, and no vineyard removal is proposed. There are no viewshed issues and the project will be subject to the County's expanded housing impact fees. The project proposes safety improvements to the existing road and initiated other safety improvements to the public roadway. The project, as proposed, meets all County Code requirements and complies with General Plan Policies. There exist operational factors, including compliance with all WDO and Zoning Code regulations, has no significant environmental impacts, and sufficient water supply, which have led staff to conclude that the project merits approval as proposed and conditioned.

Action Required - Follow proposed action listed in Executive Summary. If conditions of approval are to be amended, specify conditions to be amended at the time the motion is made.

Option 2 - Reduced Visitation/Marketing Alternative

Disposition - This option could result in a further decrease in the proposed visitation and marketing program as originally requested and modified by the applicant.

Action Required - Follow the proposed actions listed in the Executive Summary and amend the scope and project specific conditions of approval to reduce the permitted visitation and marketing events. If major revisions to the conditions of approval are required, the item will need to be continued to a future date.

Option 3 - Deny Proposed Project

Disposition - In the event the Commission determines that the project does not, or cannot meet the required findings for the granting of a Use Permit Modification, Commissioners should identify what aspect or aspects of the project are in conflict with the required findings. State Law requires the Commission to adopt findings, based on the General Plan and County Code, setting forth why the proposed Use Permit Modification is not being approved.

Action Required - Commission would take tentative motion to deny the project and remand the matter to staff for preparation of required findings to return to the Commission on a specific date.

SUPPORTING DOCUMENTS

- A . Recommended Findings
- B . Recommended Conditions of Approval and Final Agency Memos
- C . Previous Projects Conditions
- D . Initial Study/Negative Declaration
- E . Public Comments
- F . Use Permit Modification Application
- G . Road Exception Request
- H . Traffic
- I . Notice of Violation
- J . Graphics
- K . Winery Comparison Analysis and Summary of Changes

L . Petitioners Comments

Napa County Planning Commission: Approve

Reviewed By: Charlene Gallina