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Agenda Date: 4/1/2015

Agenda Placement: 9B

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: John McDowell, Deputy Planning Director - 299-1354

SUBJECT: The Caves at Soda Canyon Minor Modification P14-00288-MOD

RECOMMENDATION

CUSTOM CRUSH WINERY / NAPA CUSTOMER CRUSH LLC - USE PERMIT MINOR MODIFICATION (#P14-00288-MOD)

CEQA Status: Consideration and possible adoption of a Categorical Exemption pursuant to the California Environmental Quality Act (CEQA), Section 15301, Class 1, which exempts minor alterations to existing buildings; Section 15303, Class 3, which exempts construction and operation of small wineries; and Appendix B, Class 1 (modifications to existing use permits), of the Napa County's Local Procedures for Implementing the California Environmental Quality Act. 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 Minor Modification to the existing Use Permit No. P08-00527 to: (a) Recognize an already constructed 4th portal concealed by existing vegetation to the valley floor; (b) Allow a 700 square foot tasting area outside of the 4th portal; (c) Allow 3-100 square foot outdoor tasting areas; (d) Allow for an access path traveling from the 4th portal tasting area to two tasting areas at the top of the hill; and (e) Allow for on premise consumption within the tasting area of the cave and all four outdoor tasting areas of wines produced on site in accordance with Business & Professions Code Sections 223396.5 (also known as the AB 2004 [Evans 2008] or the Picnic Bill). There are no proposed changes to the winery production level - 30,000 gallons per year, visitation (maximum 20 daily visitors; maximum 70 visitors per week); marketing plan: six (6) private wine and food events for wine trade personnel – maximum 20 guests; 10 private wine and food events – maximum 100 guests; 1 private harvest event-maximum 200 guests: 1 open house during the Napa Valley Wine Auction for wine auction ticket holders, or number of employees (maximum 3 FT and 1 PT). The 41.35 acre project parcel is located 1,300 feet west of Soda Canyon Road, east of Silverado Trail, approximately 4 miles north of the intersection of Silverado Trail and Soda Canyon Road within an AW (Agricultural Watershed) zoning district: at 2275 Soda Canyon Road, Napa, (APN: 039-640-012).

Staff Recommendation: Find the project Categorical Exempt and approve the Use Permit Minor Modification as

conditioned.

Staff Contact: John McDowell; (707) 299-1354; john.mcdowell@countyofnapa.org

Applicant Contact: Ryan Waugh, (707) 738-6446; ryan@thecavesatsodacanyon.com

EXECUTIVE SUMMARY

Proposed Actions:

That the Planning Commission:

1. Find the project Categorically Exempt, as set forth in Findings of Exhibit A;
2. Approve the Minor Modification Use Permit (P14-00288) based on Findings 2-6 of Exhibit A and subject to the recommended Conditions of Approval (Exhibit B).

Discussion:

This use permit modification request will recognize an existing outdoor tasting areas previously developed without benefit of permit at the Napa Custom Crush Winery located at 2275 Soda Canyon Road. This facility is also known as The Caves at Soda Canyon. It is a recently completed 30,000 gallon per year winery developed within an approximately 17,800 sq. ft. cave near the top of the ridgeline separating Soda Canyon from Napa Valley. The approved winery project is oriented on the eastern slope of the ridge with three cave portals, an outdoor work area, employee and visitor parking, and outdoor storage and mechanical equipment areas all accessed from a paved private road connecting to Soda Canyon. During construction of the approved project, a portal was extended to the western side of the ridge for ventilation purposes. In the original approval all tasting facilities were to be located within the cave, however, the permittee modified the development during construction to add an approximately 700 sq. ft. outdoor visitation space at the western cave portal. In addition, a foot path was extended from the western portal to an existing graveled area on the ridgeline which has been used for outdoor visitation.

County Code Enforcement Staff have been working with the permittee to resolve this discrepancy, as well as, several visitation violations that occurred prior to the grant of final occupancy. The permittee is seeking approval of this use permit modification to now allow the outdoor visitation areas and resolve the last remaining item on the enforcement case. During processing of the use permit modification at a staff level, a courtesy notice was sent to property owners in the vicinity. Several area residents expressed concern with the project and objected to the modification being handled at a staff-level. County Code Section 18.124.130 states that minor modifications are reserved for "minor, non-controversial..." projects that do not change the overall density, intensity, concept or environmental effect. Although this project does not trigger general thresholds for a major use permit modification, the project was referred to the Commission given the apparent irreconcilable concerns of area residents consistent with the guiding language of Section 18.124.130.

Staff is recommending approval of the project, subject to the attached conditions of approval. As with most cases where approval is sought after improvements were installed, Staff approaches our recommendation from a standpoint as if the improvements had yet to be installed. In that regard, the proposal to add the tasting area outside the fourth portal and adding outdoor visitation/picnic areas on the top of the ridgeline appears relatively minor in overall scale, has no visibility from viewshed roads, does not appear to affect any adjacent neighbors, and thus the project appears supportable. The permittee is not requesting changes to approved visitation and marketing which are set at relatively modest levels when compared to similar sized wineries. On the other hand, the Commission is in no way obligated to approve the request, and denial of the application would simply mean

that these areas must be returned to a state consistent with the original current approval, which would retain the fourth portal but all visitation would need to be conducted within the cave.

FISCAL IMPACT

Is there a Fiscal Impact? No

ENVIRONMENTAL IMPACT

Consideration and possible adoption of a Categorical Exemption pursuant to the California Environmental Quality Act (CEQA), Section 15301, Class 1, which exempts minor alterations to existing buildings; Section 15303, Class 3, which exempts construction and operation of small wineries; and Appendix B, Class 1 (minor modifications to existing use permits), of the Napa County's Local Procedures for Implementing the California Environmental Quality Act. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

BACKGROUND AND DISCUSSION

Owner/Applicant: Ryan Waugh, Napa Custom Crush, 2275 Soda Canyon Rd., Napa, CA 94558 (707) 738-6446

Zoning District: Agricultural Watershed (AW)

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

Filed: September 10, 2014 **Complete:** February 11, 2015

Parcel Size: 41.34 acres (APN's 039-640-011 & 012 split for Assessor's purposes, one overall legal lot of record)

Winery Characteristics:

Winery Size (Approved): 16,000 sq. ft. cave with outdoor work area, parking and mechanical in front of cave portals

Production Capacity (Approved): 30,000 gallons per year (no changes proposed)

Number of Employees (Approved): 3 full-time and 1 part-time

Visitation (Approved): 20 visitors maximum per day; average of 70 visitors per week (no changes proposed)

Marketing Program (Approved): (no changes proposed)

- a. 6 private wine and food events for wine trade personnel per year for a maximum of 20 guests and an average of 10 guests
- b. 10 private wine and food events for a maximum of 100 guests per year with an average of 30 guests
- c. 1 private harvest event per year for a maximum of 200 guests

d. Participation in the annual Napa Valley Wine Auction is permitted as a Category 5 Temporary Event.

Adjacent General Plan Designation/Zoning District/Land Use:

North:

AWOS General Plan Designation, AW Zoning – Ridge line rural estate on large parcel; residence located approximately 950 ft. from winery project

South and West:

AWOS General Plan Designation, AW Zoning – Undeveloped hillside parcel and Hillside rural estate parcel; residence located approximately 1,975 ft. from winery project

East:

AWOS General Plan Designation, AW Zoning - Hillside rural estate parcel; residence located approximately 1,275 ft. from winery project

Code Compliance History:

December 2008 - A code case was opened for commencement of the cave without County permits. The case was closed with the issuance of portal and grading permits in 2009. The case occurred in the period was the County was transitioning into actively regulating cave construction. In prior years, the County allowed the digging of the cave under the auspice of State permitting for mining activities, and only required building permits near completion of the project for tenant improvements (plumbing, electrical, mechanical, ventilation, etc.) and for the cave portal permits which is defined as a structure in the building code. This old process was highly problematic on several cases where caves were being dug in advance of use permit approvals and/or cave projects resulted in substantial violations of County Conservation Regulations. In response, by 2007 the County began requiring cave portal permits and grading permits for cave tailings and outdoor staging areas to be issued before cave construction could commence.

April 2014 - Neighbor complaints were received regarding noise and excessive use of the generator. This case was closed, as noted below, when noise attenuating blankets were installed around the generator to comply with County noise standards.

2013/2014 - Subsequent to the construction of the ventilation opening authorized in Use Permit Modification P08-00527-MOD (described in the following section), a building permit plan check revision was submitted which showed the western (fourth) portal as an existing feature. Staff investigation determined that the ventilation shaft had been improved with the outdoor visitation space and visitation was being conducted prior to grant of final occupancy of the cave. The visitation violation was resolved when the applicant ceased conducting visitation. Resolution of the outdoor visitation space is dependent upon the outcome of this use permit modification. If the outdoor space is approved, visitation can commence as soon as the space receives final occupancy. If it is not approved, the space would need to be returned to the state it was originally approved for and all tastings must occur within the completed portion of the cave that is approved as tasting space.

Property History:

June, 2005 - Viewshed P05-0005-VIEW was approved for a two-story 8,055 sq. ft. residence on the ridge line knoll south of the cave winery project. This home was proposed by the prior owner of the property, Gary Houck. It is unknown if the current property intends to move forward with this project in the future.

July, 2006 - Under the prior ownership, Viewshed P06-0138 VIEW was proposed and approved to add a 1,200 sq. ft. second unit and 1,000 sq. ft. guest cottage along the ridge line north of the proposed residence in close proximity to what is now proposed as the outdoor tasting area.

August 2, 2006 - The Planning Commission approved the original Waugh Winery Use Permit P05-0391-UP and Exception to the Conservation Regulations P06-01008-UP. The property owner of the overall parcel was Gary Houck at the time, but the Assessor assigned two parcel numbers to the single legal lot apparently to differentiate the area leased by the Waugh Winery from the remainder of the parcel held in simple fee title by Gary Houck.

April 10, 2010 - The Director approved Use Permit Modification P08-00527-MOD for the winery to allow revisions to the driveway alignment, event parking area, cave portal elevations, wastewater disposal field and to increase the area of the cave from 16,000 sq. ft. to 17,800 sq. ft.

August 28, 2013 - The Director approved Use Permit Modification P13--00048-MOD to modify the design of the access road based on the recommendation of the Public Works Department for grant of an exception to the County Road and Street Standards. Standard road width for winery roads is 18 ft. with 2 ft. shoulders. The Traffic and Engineering Divisions may support alternative designs to private roads upon making any of three findings pertaining to retaining natural features, such as trees and reduced grading, and conforming to legal constraints provided that the design achieves the same overall practical effect. In this case, Public Works engineers endorsed a reduced width road in several areas contingent upon turn outs being provided a certain intervals. This is a relative common design alternative for hillside private roads with low traffic volumes.

Discussion Points:

Process:

Issue: Addition of the cave portal and outdoor tasting areas can qualify for processing as a very minor use permit modification, but only for "noncontroversial" projects.

Regulation:

County Code Section 18.124.130, *Use permit modifications - Procedure - Size limitation*, sets forth the parameters for processing changes to previously approved use permits. Projects that result in no increase in intensity, density, environmental affect, and that do not affect overall concept or substantially alter or delete environmental mitigations can qualify as either a minor modification or very minor modification. Minor modifications allow increases in building sizes up to 25% of the original structure(s), whereas very minor modifications are limited to no greater the 10% of an increase in structure(s). Minor modifications are processed at a Zoning Administrator level but only require a hearing if after public notice is sent a hearing is requested by an interested party. Very minor modifications are processed administratively and public notice is not required. However, a courtesy notice is often provided to gauge the degree of controversy that may be present on the application. Staff is obligated to evaluate the level of controversy because minor modifications are limited to "noncontroversial" projects. In practice, after a courtesy notice is sent, Staff attempt to work through any controversial items between the applicant and interested parties but if that is not achievable the item is referred to the Commission following the same process for major modifications and new use permits.

Analysis:

The use permit modification is a step in a code enforcement action that resulted from the original project construction going beyond the scope of approval. Neighbors expressed great concern that staff was processing this application given that it was a request for approval of something that had already been implemented. Staff agreed to refer the matter to the Planning Commission for a formal public hearing.

It is very common, in fact almost a given, that winery projects will be modified to some degree during the construction process. Unlike many typical urban developments, like a fast food chain restaurant where the same floor plan is used over and over again in community after community, each winery follows a unique vision, and as such it is pretty a regular occurrence that the owner's vision will change to some degree as the project moves forward. Mid-construction project changes can have huge consequences for permittees on schedule and

costs. As such, it is common for permittees to advocate to staff the project changes be found in "substantial conformance" with the original approval. In many cases, a substantial conformance finding is appropriate. For example, on a cave project, changing the interior layout of the tunnels has little to no bearing on the use permit entitlement as long as the caves are not expanded and the purpose of the caves remains the same.

In this case, during construction the permittee requested a change to the cave layout to extend a shaft to west allowing a ventilation opening to occur in the area that later became the unpermitted fourth cave portal. Staff found this ventilation opening in substantial conformance with the use permit. Adding ventilation shafts is quite common on cave projects. At a point subsequent to this approval, it was discovered that the ventilation shaft had been improved to a full portal with a concrete apron. It would be appropriate for the Commission to hear from the applicant why this occurred, and why they chose to finish it as a tasting/visitation space. From Staff's perspective, it appears that the permittee considered the improvement very minor and generally in keeping with the permit perhaps viewing the change from a ventilation shaft to a portal with outdoor tasting area as being inconsequential on the overall scope of the entitlement. Staff is not condoning the action, but simply recognizing that field changes occur that applicants genuinely believe, right or wrong, do not rise to a level triggering regulating agency oversight.

Conclusions: Referral of this project to the Commission addresses concerns about the project being heard only at a staff level.

Accessory Use to Production Use Ratio - Outdoor Accessory Uses:

Issue: The extent of outdoor visitation spaces at wineries may raise concerns whether visitation at wineries remains subordinate and accessory to production of wine.

Regulation:

County Code Section 18.104.200, *Accessory structures related to wineries in AP/AW districts - Maximum square footage*, sets forth that the maximum amount of "structures" used for accessory uses shall not exceed 40 percent of the area of the production facility. By way of example, if 10,000 sq. ft. of winery development area is dedicated to wine production, then a maximum of 4,000 sq. ft. may be permitted for uses that are accessory to wine production, such as offices, tasting rooms, product displays, kitchens, etc. This code section defines those areas, both within structures and outside that qualify as production space, but the code does not define what constitutes accessory space other than to state that the limit applies to accessory uses within "structures". In practice, the County has only applied the accessory use limit to enclosed spaces within structures including tasting rooms, event space, visitor restrooms, offices, associated hallways and corridors, commercial kitchens and similar feature not directly related to wine production.

Analysis:

The County is under no obligation to approve an outdoor visitation area as part of a use permit or use permit modification request. In absence of a specific regulation limiting the amount of outdoor visitation space, the Commission simply must exercise its discretion to determine if the nature of outdoor visitation is consistent with the policies of the General Plan, the other various applicable County Code requirements (environmental health, engineering, fire, and building standards), and meets the intent of the Zoning regulations especially in regards to the Winery Definition Ordinance. County Code and use permit approvals are permissive: uses that are not expressly permitted must be approved in order to be allowed. Applicants should expect to provide rational supporting their request for outdoor visitation space demonstrating that the request is appropriate in scale, scope, location, and clearly subordinate to, and in support of, the wine made at the facility.

To approve a use permit or modification, the Commission must find that the project meets 7 required findings enumerated in Section 18.124.070. As it relates to accessory uses at wineries, findings C and D of this section are directly applicable. Finding C stipulates that the project, as conditioned, will not adversely affect the public health, safety or welfare. Finding D requires that the project be found to comply with all applicable provisions of County

Code and General Plan. In this regard, as the Commission exercises its judgment, it is within the Commission purview to find that the extent of outdoor visitation can exceed the WDO's mandate that accessory uses be clearly subordinate and ancillary in nature to the production of an agricultural product. The land is zoned for agricultural use, not commercial use. Commercial activities at wineries can only occur if it is in direct support of the wine being made at the facility.

In this case, Staff believe the extent of outdoor visitation areas is reasonable in scale to the extent of wine production approved and occurring at the facility, especially given the fact that these spaces have already been created and Staff have had an opportunity to see how they function. The Commission is under no obligation to approve these existing improvements. The consequence of denial of the use permit would be that the permittee would need to return these areas to their prior state and not use them for outdoor visitation. This is why staff approached its evaluation from the perspective as if the improvements did not already exist. If this improvements did not exist and the permittee was seeking a change in design to add them, would they be supported by County regulations? Staff believe they would be supported. All commenting departments have found the project consistent with the regulations specific to their individual disciplines. The improvements do not result in any significant environmental impacts. We have allowed outdoor visitation spaces at hundreds of wineries. So perhaps decision to approve the improvements after the fact should rest in large degree on the applicant's ability to demonstrate to the Commission why these outdoor visitation spaces are integrally necessary to support the sale of wine made at the facility.

Conclusion: The extent of outdoor visitation spaces appears consistent with the requirements of the WDO. However, in the event that the Commission believes entitled visitation areas are too expansive for this facility, the Commission may wish to consider a commensurate reduction in the amount of approved indoor visitation space (within the cave) in turn for granting approval of the outdoor visitation areas.

Neighbor and Public Comments:

Issue: Interested area property owners and residents have expressed concerns about the project (see attachment letters and comments).

Regulation:

County Code Section 18.124.070.C is the third finding required for grant of a use permit or modification which requires the Commission to find that the project will not adversely affect the public health, safety or welfare.

Analysis:

Finding C is a very broad finding and involves a great deal of discretion especially in regard to the protecting the public's welfare. The Commission must exercise its own judgment to discern whether concerns over a proposed project rise to a level causing an adverse affect on the welfare of others, and whether components incorporated into the project to ameliorate neighbor concerns fully address the potential adverse affect on public welfare. In this regard, the public welfare finding is quite similar to the Commission's findings on the adequacy of the CEQA document but with one exception. The Commission may find that the project that otherwise does not have a significant environmental impact can still be found to result in a substantial adverse affect on public welfare. By way of example, a project that generates substantial amounts of traffic on a road with very little existing traffic may not increase traffic enough to degrade the level of service on the roadway, and thus not constitute a significant environmental effect under CEQA, yet still could change the bucolic, sleepy nature of the road in a manner that the Commission finds has adversely affected the welfare of those who use the road. This is a delicate issue though. The judgment must be based on substantial evidence in the record, and a finding of adverse affect on public welfare should be tied back to guiding policies and/or regulation in the General Plan and County Code. In other words, this example of adverse affect is more defined if the General Plan has policy language that the character of bucolic, sleepy roads should remain unaltered.

In this case, the Commission should consider the letters and comments current in the record as well as any other public testimony given at the hearing before applying the public health, safety and welfare test (finding). From a CEQA standpoint, the project is quite small in scale, even from the perspective if it had yet to be built, and because no changes in the overall intensity of the facility are being proposed, it does not have a potential to significantly impact the environment. The project qualifies for a Categorical Exemption. It has no potential to change traffic or water use discernably. Aesthetic requirements are addressed by the requirements of the Viewshed ordinance. The disturbed areas were previously found not to contain any protected biological resources, before the disturbance occurred.

Conclusion: That the Commission evaluate public comments to determine if the project adversely affects the public welfare.

Viewshed:

Issue: The cave portal and portions of the outdoor visitation areas are on and in close proximity to a major ridge line that is subject to the County's Viewshed Ordinance.

Regulation: County Code Section 18.106, *Viewshed Protection Program*, applies to all land development activities on hillside areas exceeding 15% in slope or located on or in close proximity to a minor and major ridge line. The ordinance stipulates four progressive levels of discretionary review based on the degree of visibility of the improvement from designated viewshed roads, the proximity of the improvement(s) to major and minor ridge lines, and the degree of conformance with the recommended design guidelines. Projects that are found to be screened by natural features from view of a designated viewshed road are administratively cleared contingent upon a recorded agreement being executed that ensures the natural barrier remain. Projects visible to viewshed roads but greater than 25 ft. below a major or minor ridge line, and which comply with all of the standards for the design guidelines are processed at a Staff level and are subject to public noticing prior to the PBES Director rendering a decision. Projects within 25 ft. of a major or minor ridge line and compliant with design guidelines are subject to a Zoning Administrator public hearing. Projects that do not comply with the design guidelines (exceptions are expressly permissible), and/or projects that have a companion action like a use permit, are subject to the Planning Commission public hearing. The main design component of the ordinance is that structures (the whole of the project visible from a viewshed road) must be "predominantly screened", which is defined as 51% of the features being screened. Only the Planning Commission has the authority to approve a viewshed application that do not meet the 51% screening requirement.

Analysis: The cave portal and outdoor visitation areas are subject to viewshed analysis because they are located within 25 ft. of a major or minor ridge line in a general area visible to Silverado Trail and Highway 29. In applying the processing level test described above, staff determined that the improvements are not visible from either Highway 29 or Silverado Trail and thus qualify for administrative clearance. The applicant has prepared an exhibit with photos of the site taken from viewshed roads. If the Commission disagrees with staff's determination, the Commission could apply a viewshed action to the project, but in doing so, the Commission would be subjecting the project to the 51% screening requirement enumerated in County Code.

Conclusion: Staff recommends that the Commission applied the recommended conditions of approval which require the applicant to maintain the native vegetation that screens the portal from view. If the Commission wishes, native vegetation could be required in the vicinity of the foot path and other outdoor tasting areas.

Employee Levels:

Issue: The 2006 project approval limits employee levels to 3 full time employees and one part time employee, but the as-built operation features four different wine making entities that has some potential to conflict to this operational requirement..

Regulation: Use Permit P05-0391-UP limits on-site employment at the facility to 3 full time employees and 1 part time employee. The Use Permit, and County administrative policy does not limit the number of customer producers or alternating proprietors at a winery but the overall facility remains subject to maximum employment levels specified in the use permit.

Analysis: Approximately two years ago the County changed how employee levels at wineries were described and limited. This is due to the fact that the operational characteristics of wineries tend to have less than clear boundaries as to what constitutes a full time and part time employee when compared to other business types. It is common for wineries to have persons on site who are not technically employees of the winery including but not limited to: custom wine producer and alternating proprietor staff, consulting wine makers, gardeners, visiting chefs, mobile bottling company staff, special event staff, catering staff, security, entertainment staff, etc. At this project, the business plan is centered off of the owner's winery, Waugh Family Wines, but there are three other wine companies utilizing the facility. Like many smaller wineries, there are periods of time when no employees are on site even though all four wine brands employ several people "full time". Likewise, there is the potential for several employees from several wine brands to be on site at the same time, which again is not typical of what would be seen in many other types of business. Therefore, in response to this situation, employee levels specified in use permits have been generalized to reflect the fluid nature of employee levels at facilities. Wineries are now classified with employee ranges set at small (10 or fewer employees), moderate (10 to 24 employees) and large (25 and greater with a specific maximum set). Employee levels are considered to be the total number of persons on site working in some capacity for the winery at a given time, but does not include staffing for the larger and infrequency special events (large marketing events generally with 100 or more guests occurring less than 10 times per year). Based on what Staff knows about the operational characteristics of this winery with 4 custom producers/alternating proprietors, it appears that it would be appropriate to update the use permit to reflect that is a winery with 10 or fewer employees.

Conclusion: Staff has included a condition of approval reflecting that this winery is a 10 or fewer employee winery.

Power Generator:

Issue: The project receives power from an on-site generator when it was anticipated that the original project would tie into the PG&E power grid off of Soda Canyon Road.

Regulation: The International Building Code (IBC) requires all developments to have a permanent power source completed and inspected prior to grant of final occupancy, which can be either connection to a public utility provider or provided by a reliable private power source such as a generator.

Analysis: Apparently during construction of the project the permittee attempt to secure power line access across intervening properties between the project site and Soda Canyon Road. When that proved infeasible for the permittee, they decided to supply power from an on-site generator. After the generator was installed, neighbors complained about noise. Code Enforcement Staff investigated and determined that noise from the unshielded generator exceed noise standard enumerated in County Code. The code case was resolved with the installation of sound attenuating blankets and the case was closed.

Conclusion: This issue is a component of the building permit and associated grant of final occupancy for the main winery project and is now a closed case.

SUPPORTING DOCUMENTS

A . Exhibit A Findings

- B . Exhibit B Conditions of Approval
- C . Public Comments
- D . Prior Use Permit Approval Part 1
- E . Prior Use Permit Approval Part 2
- F . Prior Use Permit Approval Part 3
- G . Comparison Winery Chart
- H . Accessory Use Areas Exhibit
- I . Application
- J . Prior Building Permit
- K . Graphics

Napa County Planning Commission: Approve

Reviewed By: Charlene Gallina