

A Tradition of Stewardship A Commitment to Service Agenda Date: 4/18/2012 Agenda Placement: 9A

Napa County Planning Commission **Board Agenda Letter**

TO: Napa County Planning Commission

FROM: John McDowell for Hillary Gitelman - Director

Conservation, Development & Planning

REPORT BY: Sean Trippi, Principal Planner - 299-1353

SUBJECT: Hall Winery Use Permit Modification (P11-00452)

RECOMMENDATION

HALL WINERY / HALL ST. HELENA WINERY LLC & HALL HIGHWAY 29 WINERY LLC - USE PERMIT MODIFICATION P11-00452

CEQA status: Subsequent Mitigated Negative Declaration (MND) previously prepared and adopted on January 18, 2006. The majority of the proposed modifications to this project are within the scope of the analysis of the previously approved Subsequent MND. The increase in floor area is Categorically Exempt pursuant to Section 15301 of the California Environmental Quality Act, Class 1, which exempts minor additions and alterations to an existing structure and 15311, Class 11, which exempts small parking lots. This project is not on any of the lists of Hazardous waste sites enumerated under Government Code section 65962.5.

Request: Approval of a modification to previous use permit approvals for the Hall winery to update the phasing plan and to allow the following improvements as part of Phase 3: 1) restoration of the historic Peterson-Bergfeld building including use of the first floor for barrel storage and previously approved marketing events and use of the second floor for previously approved marketing events instead of the display of viticultural, enological and historic items; 2) reducing the floor area of Production Building 2.2 from 30,249 sq. ft. to 19,347 sq. ft. (a loss of 10,902 sq. ft.); 3) construction of a new 9,965 sq. ft two-story hospitility building attached to the north side of Production Building 2.2 (a gain of 9965 sq. ft.); 4) construction of a new 5,500 sq. ft. two-story office building attached to the east side of Production Buildings 2.1 and 2.2, replacing the previously approved 3,902 sq. ft. reception/viticulture control building (a gain of 1,598 sq. ft.); 5) 25 new parking spaces on a pervious surface located north of the existing parking lot; 6) construction of a new 990 sq. ft. unenclosed outdoor terrace west the Peterson-Bergfeld building; and 7) construction of a new 500 sq. ft. outdoor barbecue/restroom pavilion with approximately 460 sq. ft. of enclosed floor area northwest of the Peterson-Bergfeld building. The following improvements would occur as part of Phase 4: 8) construction of the previously approved 10,902 sq. ft. hospitality building west of the Peterson-Bergfeld building; 9) construction/relocation of the previously approved 19,361 sq. ft. Production Building 1 northwest of the Peterson-Bergfeld building which will require the removal of the 500 sq. ft. outdoor barbecue/restroom building; 10) construction of the previously approved 29,093 sq. ft. Production Buildings 3.2 and 3.3 between existing Production Building 3.1 and the pond; 11) conversion of the existing 1,752 sq. ft. distillery building to display viticultural, enological and historic items; and 12) conversion of the existing 3,080 sq. ft. public tasting area to office use. The proposed project would result in a net gain of 661 sq. ft. of floor area. No changes to production, tours and tasting, marketing, number of employees, hours of operation, or general building locations/setbacks are proposed. The winery is located on a 33.2 acre site on the west side of State Route 29, between Lewelling Lane to the north and Inglewood Avenue to the south within an Agricultural Preserve (AP) zoning district. APN's: 027-120-052, 061 (SFAP) & 062 (SFAP). 401 S. St. Helena Highway, St. Helena.

Staff Recommendation: Find the majority of the proposed modifications to this project are within the scope of the analysis of the previously approved Subsequent MND and that the increase in floor area is categorically exempt and approve the requested use permit modification as conditioned.

Staff Contact: Sean Trippi, 707-299-1353 or sean.trippi@countyofnapa

EXECUTIVE SUMMARY

Proposed Action:

That the Planning Commission:

- 1. Find the majority of the proposed modifications to this project are within the scope of the analysis of the previously approved Subsequent MND and that the increase in floor area is categorically exempt, as set forth in Findings 1 and 2 of Exhibit A.
- 2. Approve Use Permit Modification No P11-00452 based on Findings 3-7 of Exhibit A and subject to the recommended conditions of approval (Exhibit B).

Discussion:

According to the application materials previously submitted by the applicant, wine has been produced on the site since the late 1800's. During the mid 1930's the site became a large volume, bulk-processing facility. The first use permit addressing winery operations on the site was approved in 1975. A number of use permits and use permit modifications have been approved on the subject property since 1975 which established various conditions of approval for operation of the winery. The current request includes refining the phasing plan, adding 25 parking spaces on a pervious surface, and adding about 660 sq. ft. feet of floor area. The existing facility pre-dates the Winery Definition Ordinance (WDO), a portion of which is located within the setback from State Route 29. Expansion of pre-WDO facilities is permitted upon grant of a use permit modification contingent upon all expanded aspects complying with the WDO. The proposed project appears consistent with these requirements, and therefore, approval of the modification is recommended.

FISCAL IMPACT

Is there a Fiscal Impact? No

ENVIRONMENTAL IMPACT

The use permit modification approved in 2006 was evaluated under a subsequent Mitigated Negative Declaration (MND). The subsequent MND assessed the potential environmental effects of the Hall Winery, including expected individual and cumulative environmental impacts resulting from the approval, construction, and operation of the project. Mitigation measures were incorporated into the project as conditions of approval to reduce avoidable potential impacts to less than significant levels.

The current request includes revising the phasing plan, adding 25 parking spaces on a pervious surface, reducing the floor area of Production Building 2.2 from 30,249 sq. ft. to 19,347 sq. ft. (a loss of 10,902 sq. ft.), constructing a new 9,965 sq. ft two-story hospitality building attached to the north side of Production Building 2.2 (a gain of 9,965 sq. ft), constructing a new 5,500 sq. ft. two-story office building attached to the east side of Production Buildings 2.1 and 2.2, replacing the previously approved 3,902 sq. ft. reception/viticulture control building (a gain of 1,598 sq. ft.), constructing a new 500 sq. ft. outdoor barbecue/restroom pavilion, which will be removed as part of Phase 4, 25 new parking spaces on a pervious surface, and other site improvements. The result of the proposed building alterations result in a net gain of approximately 661 sq. ft. of floor area. All of the proposed improvements would be located within existing winery development area (disturbed areas) of the site.

Excepting the additional 661 sq. ft. of floor area and the 25 parking spaces, the proposed use permit modification is within the scope of the previously approved subsequent MND. No new environmental impacts that were not assessed by the subsequent MND would result from the proposed modification; no substantial changes are proposed that would require major revisions of the subsequent MND; no substantial changes would occur with respect to the circumstances under which the project is being undertaken which would require major revisions of the subsequent MND; and, there is no new substantial information.

The additional floor area and new parking spaces are Categorically Exempt pursuant to Section 15301 of the California Environmental Quality Act, Class 1, which exempts additions to an existing structure, and 15311, Class 11, which exempts small parking lots.

This project is not on any of the lists of hazardous waste sites enumerated under Government Code section 65962.5.

BACKGROUND AND DISCUSSION

Owner: Hall St. Helena Winery LLC & Hall 29 Winery LLC

Representative: Mike Reynolds (707) 967-2621

Zoning: AP (Agricultural Preserve)

General Plan Designation: AR (Agricultural Resource)

Filed: November 23, 2011 Complete: February 24, 2012

Production Capacity (approved): 1,260,000 gallons per year

Production Capacity (proposed): No Change

Winery Size -

Development Area (existing / approved): approximately 79,392 sq. ft. / 162,356 sq. ft.

Development Area (proposed): 160,632 sq. ft.

Winery Coverage (approved / proposed): approx. 350,834 sq. ft. or 8.05 acres (24.1%) / 359,834 sq. ft. or 8.25 acres (24.6%)

(winery coverage is a maximum of 25% of parcel or 15 acres, whichever is less)

Production Facility (existing / approved): approximately 49,960 / 140,454 sq. ft. **Production Facility (proposed):** 68,907 sq. ft (Phase 3) / 141,573 sq. ft. (Phase 4)

Accessory Use (existing / approved): approximately 4,832 sq. ft. / 36,437 sq. ft. Accessory Use (proposed): 23,652 (Phase 3) / 33,812 (Phase 4)

Accessory to Production Ratio (existing / approved): 8.9% / 27.5%

Accessory to Production ratio (proposed): 34.3% (Phase 3) / 19.2% (Phase 4) (accessory to production ratio is a WDO maximum of 40%)

Visitation -

Marketing (approved): 12 wine and food events per year with 100 guests; 3 wine tastings and meals per week with 30 guests; and, 3 Napa Valley wine auction-related events per year with 500 guests. **Marketing (proposed):** No change

Tours and Tastings (approved): 500 visitors per day or 3,500 per week (maximum) open to the public/drop-in **Tours and Tastings (proposed):** No change

Number of Employees (approved / proposed): 33 full-time & 5 part-time / No Change

Days & Hours of Operation (approved): Hours of operation are 8:00 A.M to 4:00 P.M. Monday through Thursday for administrative personnel; 9:30 AM to 5:30 PM, seven days a week, for sales and marketing (tours and tasting); 10:00 AM to 5:00 PM, seven days a week, for retail sales; and, 4:00 AM to 2:00 AM, Monday through Thursday (2 shifts, year round) and 4:00 AM to 2:00 AM, seven days a week (2 shifts, during harvest) for production/operations **Days & Hours of Operation (proposed):** No change

Parking (approved / proposed): 150 / 175 (the additional 25 spaces are proposed on a pervious surface)

Setbacks:

The visitor center and former distillery building are setback approximately 335 to 400 feet from SR 29, respectively. The original project approval, allowing these setbacks, predates the requirement for a 600-foot setback from the centerline of SR 29. The previously constructed production buildings and entitled buildings, as well as the additions proposed herein are all located behind the two buildings nearest the highway within existing disturbed portions of the site.

Setting:

The property is located on the west side of State Route 29, between Inglewood Avenue and Lewelling Lane. Approximately 483 feet of the property abuts Lewelling Lane which adjoins the southern boundary of the St. Helena city limits. The property also has 60 feet of frontage on Inglewood Avenue. Access to the winery is provided by two driveways on SR 29. Emergency vehicles and farm/agricultural equipment may access the site from Inglewood Avenue. The project site is fairly level with elevations between 215 to 230 feet above mean sea level. Existing uses on the site includes vineyards, the winery buildings and associated improvements. Properties surrounding the project site range in size from 0.13 to 49.74 acres and include rural residences, vineyards,

wineries, and commercial businesses. There are a number of existing wineries within the vicinity of the project site including but not limited to Martini, Sutter Home, Prager, V Sattui, Villa Helena and Jaeger Family Vineyards. Other producing wineries in the vicinity project site include Milat winery and Corison winery, on State Route 29/St.Helena Highway to the south. Sandpoint winery, approved but not yet producing lies to the west down Inglewood Avenue.

Nearby Wineries:

Louis Martini - 254 St. Helena Hwy - 136,700 sq. ft. - 2,000,000 gal/yr - Public Tours & Tastings (1,550 visitors/week)

Sutter Home - 277 St. Helena Hwy - 41,000 sq. ft. - 200,000 gal/yr - Public Tours & Tastings (3,500 visitors/week) Prager - 1281 Lewelling Lane - 4,492 sq. ft. - 8,500 gal/yr - Public Tours & Tastings (42 visitors/week)

V. Sattui - 1111 White Lane - 34,676 sq. ft. - 96,000 gal/yr - Public Tours & Tasting (3,850 visitors/week).

Villa Helena - 1455 Inglewood Ave - 3,315 sq. ft. - 6,000 gal/yr - Tours & Tasting by appointment (20 visitors/week) Jaeger Family Vineyards - 2125 Inglewood Ave - 4,000 sq. ft. - 13,2000 gal/yr - Tours & Tastings appointment (1 visitor/week)

Milat - 1091 S. St. Helena Hwy - 4,900 sq. ft. - 20,000 gal/yr - Public Tours & Tastings (40 visitors/week) Corison - 987St. Helena Hwy - 9,480 sq. ft. - 20,000 gal/yr - Tours & Tastings by appointment (10 visitors/week) Sandpoint - 1919 Inglewood Ave - 110,941 sq. ft. - 30,000 gal/yr - Tours & Tastings by appointment (112 visitors/week)

Adjacent General Plan Designation/ Zoning / Land Use:

North:

AR General Plan designation, AP/PD/RC/CL zoning -

To the north and east of the project site are nine properties nestled between the project site and SR 29 and Lewelling Lane. The properties range in size from 0.53 acres to 2.08 acres. Four properties are zoned AP with homes on two of the lots, Sutter Home winery on one of the lots and an undeveloped lot. One lot is zoned PD and houses mobile homes. Three lots are zoned RC with homes on two of the lots and Prager winery on the third lot. The remaining lot, on the southwest corner of SR 29 and Lewelling Lane, is zoned CL is home to the Sutter Home Inn.

South:

AR General Plan designation, RS:B-1/AP/CN/CL zoning -

There are six lots ranging in size from 0.13 aces to 0.62 acres and totaling about 1.7 acres, all zoned RS:B-1. Each lot is developed with a residence. Across Inglewood are a single-family residence, Villa Helena winery (both zoned AP) and Inglewood Village Business Park (zoned CN) and Flyers gasoline station (zoned CL).

East:

AR General Plan designation, AP zoning -

Heitz Wine Cellars owns four properties across SR 29 totaling about 16.4 acres with a wine tasting room with retail sales (recognized by CLN in 1196), two residences, a vineyard maintenance building and storage yard, and vineyards. There are also three lots between the winery site and SR 29 totaling about 2.7 acres that include the Press restaurant, Dean & Deluca market, Flora Springs wine tasting, and the Vine Cliff wine shop (formerly St. Helena Wine Merchants).

West:

AR General Plan designation, RS:B-1/AP zoning -

The west side of the property adjoins a one acre property with a single-family home, and three lots ranging in size from 5 acres to 20 acres with a single-family home on each lots with the balance of each lot planted in vines.

History:

The winery was established in approximately 1885, about 35 years after the County was created, well before adoption of County ordinances which required a use permit as well as adoption of the Winery Definition Ordinance. The winery has been in continuous operation since that date and has also been known as the Napa Valley cooperative winery and the Golden State Vintners.

August 6, 1975 - The Planning Commission approved the first Use Permit, #U-697475, (Napa Valley Cooperative Winery) to add a 1,200 sq. ft. bay to an existing 2,080 sq. ft. grower's supply storage building, bringing the entire operation under use permit. The site plan showed a ±44,400 existing wine storage and fermentation building, 4,900 sq. ft. crush shed, 1,800 sq. ft. office/lab building, 3-100,000 and 2-50,000 gallon wine storage tanks, scales, cooling towers, California Department of Human Resources trailer, and miscellaneous site improvements. There were 5 existing full-time employees (up to 30 during crush) and 5 on-site parking spaces.

July 25, 1984 - The Planning Commission approved Use Permit #U-638384 (Napa Valley Cooperative Winery) increasing production capacity from 2,059,000 to 2,805,000 gal/yr with the addition of 60-20,000 gallon, 5-10,000 gallon and 15-5,000 gallon wine storage tanks. The winery was open 5 days a week, 8:00 AM to 5:00 PM, with 4 full-time and 20 part-time employees, and 20 on-site parking spaces.

February 5, 1986 - The Planning Commission approved Use Permit #U-118586 (Napa Valley Cooperative Winery) to construct a freestanding two-story 3,080 sq. ft. visitor's center. The proposal included a request to provide a picnic area for wine and cheese tasting. Approval of the permit was limited to wine tasting and wine sales only; cheese tasting and the picnic area were not allowed. The approval also included public tours and tasting for 500 visitors a day (3,500 a week). Hours of operation for the visitors center were 10:00 AM to 5:00 PM, seven days a week, run by 3 employees (2 full-time and 1 part-time). Parking for 100 vehicles on-site was approved.

May 23, 1997 - The Zoning Administrator approved Use Permit Modification #96539-MOD (Golden State Vintners) to remodel the exterior elevations of the visitor's center/tasting building; reduce the number of on-site parking spaces from 100 to 57, including a significant reduction in asphalt area (to be replaced with vineyards); a redesign of the entrance driveway to the visitor's center/tasting building; expand the fire access road; replace the two existing winery identification signs; and, revisions to the site landscaping.

May 20, 1998 - The Planning Commission approved Use Permit Modification #97365-MOD (Golden State Vintners) further remodeling the winery with the installation of new equipment, removal of structures, reconstructing 26,685 sq. ft. of the main winery building for barrel storage and bottling areas; constructing a 27,986 sq. ft. addition for case good storage, bottling, offices, workshop, and employee break room and restroom; remodeling the tank farm, relocating existing tanks and constructing new canopies over the tanks; constructing a new driveway and truck loading area and revising the on-site circulation areas; reconstructing and expanding the waste water pond to 4.5 MG; increasing number of employees from 29 to a total of 56 (51 full-time and 5 part-time); providing 88 on-site parking spaces; and, allowing 40% of total production capacity (1,122,000 gal/yr) for custom crush and alternating proprietors. The proposal resulted in an overall floor area of 165,690 sq. ft. for the facility, with the winery development area of 364,250 sq. ft. which includes buildings and impervious surfaces. Establishing the hours of operation noted above; and recognizing existing marketing activities which were three (3) private promotional wine tastings and catered meals for the wine trade and invited consumers per week averaging 30 persons per event and three (3) wine auction related events per year with no more than 500 guests at each event.

January 18, 2006 - The Planning Commission approved Use Permit Modification P05-0140-MOD (Hall Winery) decreasing production capacity from 2,805,000 gallons per year to 1,260,000 gallons per year; restoring the two-story 5,228 square foot and the 1,752 square foot historic winery and distillery buildings, respectively, for reuse as viticulture, historic, and enologic display areas; restoring and remodeling the ±19,361 square foot historic warehouse building and relocating to another location on-site for reuse as a bottling building and administrative offices; demolishing warehouse buildings, other small structures and additions, and the outdoor tank farm; constructing two new production buildings with 104,545 square feet of floor area; constructing a new 10,160

square foot two-story hospitality building and a 2,576 square foot visitor's center/reception building; constructing a 31,904 square foot underground barrel vault including a wine library and private marketing area partially beneath the hospitality building; converting the existing 3,080 sq. ft. visitors center to offices and meeting rooms; decreasing the number of full-time employees from 51 to 33; increasing on-site parking from 88 to 150 spaces; adding 12 new marketing events per year with 100 persons maximum at each event; decreasing the size and capacity of the existing process waste water pond and installing a new domestic waste water system; reducing annual water allotment from the City of St. Helena; and other site improvements.

December 5, 2006 - The Planning Director approved Use Permit Modification P06-01337 reconfiguring the reflection ponds (the ponds would still be located around the hospitality building and near the former distillery building); reconfiguring the parking lot area with no change to the previously approved number of parking spaces (150); reducing the floor area of the underground barrel storage area beneath production building #2 from approximately 31,904 square feet to approximately 30,398 square feet; reorganizing the interior floor plan of the hospitality building with no change to the areas designated for public tasting, private marketing events, and retail sales; and attaching the reception area and viticulture control room into production Building #2 and eliminating the 2,576 square foot reception and viticulture control building.

Compliance History:

Based on a review of the Planning Division's files, there are no records of any code compliance issues on this property.

Discussion:

Use Permit Modification - The use permit modification currently before the Commission generally includes revising the phasing plan; adding 25 new parking spaces on a pervious surface; modifying previously approved buildings; constructing an outdoor barbeque/restroom pavilion and other site improvements.

The improvements proposed as Phase 3 would include:

- Restoring the historic (circa 1885) Peterson-Bergfeld winery building including use of the first floor for barrel storage and previously approved marketing events and use of the second floor for previously approved marketing events instead of the display of viticultural, enological and historic items;
- Reducing the floor area of Production Building 2.2 from 30,249 sq. ft. to 19,347 sq. ft. located between the existing production buildings and the Peterson-Bergfeld building (loss of 10,902 sq. ft.);
- Constructing a new 9,965 sq. ft two-story hospitality building for public and by-appointment tours and tastings attached to the north side of Production Building 2.2 (gain of 9,965 sq. ft.);
- Construction of a new 5,500 sq. ft. two-story office building attached to the east side of Production Buildings 2.1 and 2.2, replacing the previously approved 3,902 sq. ft. reception/viticulture control building (gain of 1,598 sq. ft.);
 - 25 new parking spaces with a pervious surface located north of the existing parking lot;
 - Construction of a new 990 sq. ft. outdoor terrace behind the Peterson-Bergfeld building; and
 - Construction of a new 500 sq. ft. outdoor kitchen/restroom pavilion northwest of the Peterson-Bergfeld building.

Total gain of approximately 661 sq. ft. of floor area

The improvements proposed as Phase 4 would include:

- Construct the previously approved 10,160 sq. ft. hospitality building west of the Peterson-Bergfeld building;
- Construct the previously approved 19,361 sq. ft. Production Building 1 northwest of the Peterson-Bergfeld building;
- Construct the previously approved 29,086 sq. ft. Production Buildings 3.2 and 3.3 between existing Production Building 3.1 and the pond; and

• Conversion of the existing 1,752 sq. ft. distillery building to display viticultural, enological and historic items; and.

• Removal of the 500 sq. ft. outdoor barbeque/restroom pavilion.

Floor area devoted to public tours and tastings at each phase cannot exceed 3,080 sq. ft. pursuant to the WDO. The previous approval included converting the existing visitor center to office uses once the new hospitality building was constructed. Since the proposed 9,965 sq. ft. hospitality building includes both public and byappointment tasting areas, a new condition is included stipulating that the floor area for public tours and tastings shall not exceed 3,080 sq. ft. at the completion of both Phase 3 and Phase 4.

Access - Access to the winery would be from two existing driveways on State Route 29. The northerly driveway provides access to the customer and employees parking lot. The southerly driveway provides access to the winery production buildings and crush pad. There is also access from Inglewood Avenue which is restricted to emergency vehicles and farm equipment only. No changes are proposed to the existing points of access.

Farm Labor Units - The County Housing and Intergovernmental Affairs (HIA) Department is in the process of evaluating the feasibility of building 12 units of farmworker housing on two different sites in the unincorporated portion of the county including the Hall winery site. The other site is on Silverado Trail. There were originally four sites, but one site was sold and the other would not accommodate a septic system. The County's Engineering consultant has prepared an administrative draft feasibility report that details the sites, potential environmental concerns and conceptual building envelopes. The County's financial consultant is currently preparing a financial feasibility assessment to determine if there are sufficient resources to both pay for construction on either site as well as to offset operational costs of a completed project. Meetings are being set up by the HIA with the neighbors of the two sites to discuss their concerns prior to finalizing the report. Once all of the information is compiled, including public feedback to the proposals, the HIA would go to the Board of Supervisors to get direction on how the Board would like HIA staff to proceed.

There currently is no application of file with the County to construct farm labor units on this site and therefore no nexus with the modifications being proposed to the winery. Further, neither the proposed modifications to the winery nor a potential farm labor housing project would rely on the other to move forward.

Climate Action Plan/GHG - The Bay Area Air Quality Management District (BAAQMD) has screening criteria in their CEQA guidelines (May 2011) with regards to greenhouse gas emission. Projects may use the screening criteria Table 3-1 of the guidelines to assess an individual project's potential for a cumulative impact to air quality. The table does not include criteria for wineries so the type of use in the list that most resembles a hospitality/tasting room and office, in the case of this project, would be a quality restaurant which has a screening size of 9,000 sq. ft. and a general office building which has a screening size of 53,000 sq. ft. The addition of approximately 4,400 sq. ft. of tasting area and 1,598 sq. ft. of office area are well below this threshold. Although the screening criteria are under challenge, they still provide a basis for comparison. This project would not contribute to a cumulatively significant increase in greenhouse gas emissions.

Once adopted the County's draft Climate Action Plan (CAP) would require discretionary projects to reduce their greenhouse gas emissions by 38% below "business as usual" by applying a combination of state, local and project-specific measures. Proposed projects like this one which include a minor amount of new construction and no increases to production and visitors should be able to reduce emissions as required by the CAP. In addition, this project could also take credit for GHG reductions that have occurred at the winery since 2005, such as the installation off solar panels atop the two production buildings and a charging station for electric vehicles.

Consistency with Standards:

Zoning -

The project is consistent with AP (Agricultural Preserve) zoning district regulations. A winery (as defined in Napa County Code § 18.08.640) and uses in connection with a winery (see Napa County Code § Section 18.16.030) are permitted in the AP district with an approved use permit. This application complies with the Winery Definition Ordinance. The Fire Department, Public Works Department, and Environmental Management Department have all recommended approval of the project as conditioned.

SUPPORTING DOCUMENTS

- A . Findings
- B. Conditions of Approval
- C . Review Agency Comments
- D. Previous Conditions of Approval
- E . Application Submittal Materials
- F. Correspondence
- G . Graphics

Napa County Planning Commission: Approve

Reviewed By: John McDowell