

October 31, 2017

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Re: Comments on the Reynolds Family Winery Use Permit Modification (#P14-00334)

Dear Ms. Balcher & Members of the Planning Commission,

My name is Anthony Arger and my family owns and operates a vineyard on upper Soda Canyon Road. I must start by saying that I am torn in writing this letter because I generally support what Mr. and Mrs. Reynolds have created – a small family winery built from the ground up over many years that is located on Silverado Trail (i.e on the Napa Valley “floor” and not in its remote and rural hillsides). As such, my letter is not intended as a complete opposition to the Reynolds Family Winery Use Permit #P14-00334 (the “Project”). Instead, it is to be construed as an opposition directed at the County of Napa (“County”) based solely on the grounds of cumulative impact of winery traffic from this Project and other winery and vineyard operations that must utilize the intersection of Soda Canyon Road and Silverado Trail (the “SCR/ST Intersection”), which in turn will adversely impact the public health, safety, and welfare of the residents and property owners of the community, as well as any and all visitors and users of Soda Canyon Road.

As will be described in detail below, there are currently 42,012 tourists permitted to visit wineries either on Soda Canyon Road or at wineries near the SCR/ST Intersection (within approximately 1,000 feet) on an annual basis. If all proposed wineries at or near the SCR/ST Intersection are approved/permitted, that number will increase to 103,866 annual tourists at or near the SCR/ST Intersection – an increase of 147%. Currently, there is a significant traffic backup every afternoon at the stop sign on Soda Canyon Road for traffic trying to turn left onto Silverado Trail. There are also numerous traffic accidents that occur at or near the SCR/ST Intersection on an annual basis. An increase in visitation from 3,740 visitors per year, to 16,586 visitors per year (an increase of 443%) at the Project site will only exacerbate these existing conditions, and create added liability for the County and Project owners when the inevitable major accident at the intersection of Soda Canyon Road and Silverado Trail occurs, particularly if there is alcohol involved. While I applaud the construction of a left turn lane into the Project site, that still will not solve, and in fact may even worsen, traffic conditions currently experienced at the Soda Canyon Road/Silverado Trail intersection.

Accordingly, as much as I would like to, I simply cannot support this Project in its current form, but would be willing to withdraw my opposition to the Project and in fact would support the Project under either/both of the following circumstances: 1) significantly reduce the proposed increase in winery visitation, and/or 2) install a traffic light at the SCR/ST Intersection to alleviate existing and future traffic problems.

A. Cumulative Traffic Impacts

The Project seeks to increase its annual winery visitation from 3,740 to 16,586. (*See Winery Visitation from Current and Future Wineries on SCR & ST*, attached as Exhibit 1). As compared to some other valley floor wineries throughout the Napa Valley, this figure is not an enormous number, especially when it is viewed as a stand-alone project on the Silverado Trail. However, this project cannot be viewed as a stand-alone project, as it is located a mere 300 feet south of the increasingly busy and dangerous SCR/ST Intersection, which is currently and will continue to be impacted from several existing and proposed winery projects located on either Soda Canyon Road or within the immediate vicinity of the SCR/ST Trail intersection. Currently, on any given weekday, the morning traffic turning left onto Soda Canyon from Silverado Trail, and the afternoon traffic turning left onto Silverado Trail from Soda Canyon is terrible. Long queues of resident, vineyard worker, and winery visitor traffic regularly develop, and there have been several fender benders from cars trying to make the left turn. If traffic at this intersection continues to increase at its current pace, it is only a matter of time before there is a serious and potentially catastrophic accident at this location, which could raise serious questions of liability for both the Project's owners and the County. *See* Cal. Gov. Code §835.

More specifically, there are currently eight County approved and operating wineries on Soda Canyon Road – Antica Napa Valley, Astrale e Terra/Meadowrock Winery, La Vallette Winery, Roy Estate Vineyards, the Caves at Soda Canyon, V-12 Winery, White Rock Vineyards, and Relic Winery. On Silverado Trail, and within approximately one quarter mile of the intersection of Soda Canyon Road and Silverado Trail there are currently two County approved and operating wineries – Reynolds Family Winery and Black Stallion Winery. The combined number of current annual permitted winery visitors for the above listed ten wineries is **42,012**.

Recently, the Planning Commission approved Mountain Peak Winery,¹ located approximately 6.2 miles up Soda Canyon Road. If, after the litigation process, the Project moves forward as approved by the County, it will be permitted to host 14,575 annual winery visitors. Importantly, it will add approximately 44,275 annual car trips on Soda Canyon Road. The County also recently approved the Grassi Family Winery (located 0.2 miles up Soda Canyon Road), Beau Vigne Winery (located just north of the SCR/ST Intersection), and Sam Jasper Winery (also just north of the SCR/ST Intersection), which are permitted to host another 17,445 annual visitors.

If the Reynolds Family Winery project is approved, it will add 16,586 annual winery visitors, as well as an untold number of additional vehicles to service the increased visitation and winery production. In addition, there is the proposed Corona Winery project, which seeks to add another 16,988 annual visitors to the SCR/ST Intersection.

In total, the recently approved projects increases the number of annual winery visitors at/near the SCR/ST Intersection from 42,012 to 65,594 – an increase of 56%. **If the Reynolds expansion and Corona Winery are additionally approved, the number will climb to 103,866 annual visitors, an increase of 147% from the existing 42,012 annual visitors.** Importantly, this 147% increase in winery traffic does **not** account for the additional traffic from general winery

¹Appellants of the Mountain Peak Project filed a lawsuit in September 2017.

operations (employees, business operations, etc.) from the proposed winery projects described above (e.g. Mountain Peak adding approximately 44,275 annual car trips on Soda Canyon Road).

Of further importance with regard to traffic is that between 1999 and 2015, there has been an **88% traffic increase** (48,472 winery visitors and vineyard workers in 1999 to 78,994 in 2015) from winery visitation and vineyard workers solely from Soda Canyon wineries and vineyards at the intersection of Soda Canyon Road and Silverado Trail. (*See Vineyard Worker & Winery Visitor Traffic on Soda Canyon Road & Silverado Trail*, attached as Exhibit 2). And, if all of the above proposed wineries are approved in their proposed form, **the total number of winery visitors and vineyard workers who must utilize the SCR/ST Intersection to access the respective wineries or vineyards, will increase to 148,678, a 207% increase in winery visitor and vineyard worker traffic since 1999.** In short, traffic has steadily increased in the area, and as will be demonstrated below, so too have the number of accidents and emergency incidents.

B. Accidents & Incidents from the Sherriff's Office, CHP, and CalFire

Below are detailed descriptions of accidents and incidents at the SCR/ST Intersection and on Soda Canyon Road as reported by the California Highway Patrol ("CHP;"), the Napa Sheriff's Department, and the California Department of Forestry and Fire ("CalFire").² As a brief summary, during the three-year period from January 2014 to December 2016, there have been 639 incidents and accidents on Soda Canyon Road or on Silverado Trail at the intersection with Soda Canyon Road. Notably, the number of incidents and accidents increased *each year during this period*. Specifically, there were 175 incidents/accidents in 2014, 222 in 2015, and 242 in 2016. (*See Combined Agency Incidents*, attached as Exhibit 3). That represents a 38% increase in incidents from 2014 to 2016. Moreover, when looking at the 639 incidents and accidents by month, 74% (471 of 639) of the incidents/accidents occurred between March and October, which is during the height of the winery tourist season.

Again, I am generally **not** opposed to this Project given its location on Silverado Trail, but there are simply too many emergency incidents at the SCR/ST Intersection or on Soda Canyon Road that will only worsen if the County fails to take more action to alleviate the existing traffic problems at the Intersection. Moreover, in light of the recent fires, emergency evacuations from Soda Canyon Road cannot be over-stated, and must be taken into account as the traffic continues to accumulate in the immediate vicinity of the SCR/ST Intersection.

1. California Highway Patrol

Reports from the California Highway Patrol ("CHP") confirm the treacherous and incident-prone area of the SCR/ST Intersection where the Project seeks to increase its winery uses. Attached to this letter is a summary of the **65 incidents and accidents** as reported by the CHP that

² I personally prepared the summaries of the CHP, Sheriff's Department, and CalFire reports using detailed incident reports provided to me by the respective agencies. As an officer of the court, I declare under penalty of perjury under the laws of the State of California, that these summaries accurately reflects exactly what is contained in the much longer, more detailed incident reports for the respective agencies. However, if the applicant or the County wishes to see the full reports from each agency, I am more than happy to provide them upon request. Alternatively, any and all of them can be obtained from the respective agencies as they are all public records.

have occurred on Soda Canyon Road or at the intersection of Silverado Trail and Soda Canyon Road from January 2013 through March 2017.³ (See *CHP Incident Report Summary*, attached as Exhibit 4). During the roughly 4-year period for which reports are provided, there have been **14 incidents of driving under the influence** on Soda Canyon Road or on Silverado Trail at the intersection with Soda Canyon Road. It is also worth noting that **30 of the 65 incidents reported by the CHP during the roughly four-year period of reports provided have occurred during the last year** (between April 6, 2016 and March 22, 2017). This indicates that the **existing, increasing traffic levels on or near Soda Canyon Road have already led to a significant increase in the number of incidents that regularly occur**. Furthermore, the vast majority of the incidents (43 of 65) took place during the daytime, precisely when the Project seeks to add thousands of additional drivers, many of whom may have consumed alcohol, to the road on an annual basis.

Brief Summary of CHP Incidents on/near Soda Canyon from Jan. 2013 to Mar. 2017

Total Number of Incidents: 65

Number of 2 car collisions: 9

Number of 1 car collisions: 14
(i.e. into tree, ditch, pole, etc.)

Traffic Hazards: 6

Reckless Driving: 7

Animal in Roadway: 1

Driving Under the Influence: 14

2 Car Speed Contest: 1

Fire: 3

Semi-Trucks Stalls/Accidents: 2

Abandoned Vehicle: 2

Parking Violation: 1

Shots Fired: 1

Hit & Run: 2

Take a Report: 1

Unidentified: 1

Daytime Incidents (6am-6pm): 43

Nighttime Incidents (6pm-6am): 22

2. Napa County Sheriff's Department

From January 9, 2014 to March 6, 2017, a period of just three years and two months, **there have been 498 "Calls for Service" on Soda Canyon Road**. (See *Sheriff's Dept. Calls for Service and Naturecodes*, attached as Exhibits 5a and 5b). This is an average of 13 calls per month and 157 calls per year. Importantly, during that short period of time, there were **28 reports of Drunk Drivers**. Moreover, the vast majority (366 of 498) took place during the daytime hours, when traffic is at its highest. A summary of these calls for service on Soda Canyon Road is as follows:

Brief Summary of Sheriff Calls for Service on Soda Canyon from Jan. 2014 to Mar. 2017

Total Number of Calls (1/9/14 to 3/6/17): 498

911 Hangup Call (CODE11): 40

Abdominal Pain (ABDOM): 3

Agency Assist (AA): 3

Alarm (1033): 22

Animal Control Callout (ASO): 73

Area Check (ACK): 3

Assault (ASSAU): 4

Attempt to Contact (ATC): 3

Barking Dog (1091B): 1

Bite Animal Human Insect Reptile (BITE): 1

Bleeding Problem (BLEED): 1

Breathing Problem (BREATH): 2

Burglary (459): 4

³ It is my understanding that the CHP has jurisdiction over Silverado Trail, while the Napa County Sheriff's Office maintains jurisdiction over Soda Canyon Road.

Chest Pain (CHEST): 6	Ped Check (PEDCK): 3
Choking (CHOK): 1	Person Down (PDOWN): 2
Citizen Assist (CA): 10	Petty Theft under \$400 Loss (488): 7
Civil Problem (CIVIL): 2	Phone Message: 1
Coroner Case (1144): 3	Probation/Parole Search (SEARC): 3
Disturbance of the Peace (415): 12	Prowler (1070): 1
Drug Activity (DRUG): 2	<u>Reckless Driver (RECK): 19</u>
<u>Drunk Driver (23152): 28</u>	Security Check (SCK): 1
Elder Abuse (EABUS): 2	Seizure (SEIZU): 5
Embezzlement (EMBEZ): 1	Shots Fired (SHOTS): 4
Follow Up (FU): 25	Sick Person (SICK): 3
Found (FOUND): 2	Stolen Vehicle (10851): 1
Fraud (FRAUD): 4	Stroke (STROK): 1
Garbage Dump (GDUMP): 2	Suicide (1056): 1
Grand Theft over \$400 Loss (487): 3	Suspicious Situation (1030): 20
Harassment (HARASS): 1	<u>Traffic Collision (TC): 13</u>
Hazardous Condition (HAZCON): 2	<u>Traffic Hazard (1125): 7</u>
Lost (LOST): 1	<u>Traffic Stop (TS): 13</u>
Mail Tampering/Theft (MAIL): 7	Trauma (TRAUM): 2
Medical Needed (MEDIC): 8	Trespassing (TRES): 30
Motorist Assist (MA): 2	Unconscious Person (UNCON): 1
Napa County Ordinance Violation (NCO): 5	Vandalism (594): 6
Neighbor Problem (NPROB): 2	Vehicle Check (VCK): 11
NSIB Event (NSIB): 2	Welfare Check (WCK): 4
OCR: 1	
Overdose (OVERD): 2	Daytime Incidents (6am-6pm): 366
Patrol Check (PCK): 16	Nighttime Incidents (6pm-6am): 132
Patrol Info (PATROL): 31	

3. CalFire Incidents

The recent fires demonstrate the ever-present danger of wildland and residential fires on Soda Canyon Road. Unfortunately, this type of fire was not unexpected by Soda Canyon property owners and residents, as Soda Canyon/Atlas Peak experiences a major wildfire every 20-40 years, and has since records have been kept beginning in the 1800s. In light of the recent fires, I do not need to go into details at how serious the fire danger is for all of Soda Canyon/Atlas Peak, but only point out that increased traffic at the SCR/ST Intersection will impede evacuation and/or rescue efforts when the next big fire occurs in some 20-30 years.

In the meantime, it is important to keep in mind that CalFire deals not only with fires, but also with medical and other emergency related incidents, of which there are a significant number. Many of the residents and property owners on Soda Canyon are growing older and are increasingly requiring emergency medical assistance, as evidenced in the CalFire summary. Be it a fire truck or ambulance that needs to rush up or down Soda Canyon Road, the addition of visitors to the Project could easily impede access by emergency services to house fires, wildfires, or elderly persons needing emergency care. For example, if an accident occurs at the Project's entrance, or at the SCR/ST Intersection, and blocks the roadway, all individuals above that line are trapped because of one-way in, one-way out design of Soda Canyon Road.

In terms of data, there is a significant number of incidents reported by CalFire. (See *CalFire Summary Report*, attached as Exhibit 6). A review of the brief summary below demonstrates that from January 2005 to December 2016, there have been **318 incidents reported by CalFire on Soda Canyon Road**. And similar to the CHP and Sheriff's reports, the majority (210 of 318) of all the CalFire incidents occurred during the daytime, which again is when the most wine-tasting and associated traffic with winery operations occurs.

Brief Summary of CalFire Incidents on Soda Canyon from Jan. 2005 to Dec. 2016

Total Number of Incident Calls/Responses: 318

Number of Calls/Incidents for Medical/EMS: 156

Number of Calls/Incidents for Residential Fires: 14

Number of Calls/Incidents for Wildland Fires: 19

Number of Calls/Incidents for Reported Fires/False Alarms/Smoke Checks: 62

Number of Calls/Incidents for Traffic Collisions: 22

Number of Calls/Incidents for Hazmat/Hazardous Condition: 23

Number of Calls/Incidents for PA/Other/No-Description: 22

Daytime Incidents (6am-6pm): 210

Nighttime Incidents (6pm-6am): 108

4. Analysis of Combined Agency Incidents/Accidents

To provide an even better picture of existing incidents and accidents that occur at the SCR/ST Intersection and on Soda Canyon Road, it is instructive to analyze the total number of incidents from each agency over the period of time during which the reports overlap, which is from January 2014 through December 2016. Such an analysis is important for the County to consider because it prevents the piecemeal analyses and conclusions that could be drawn from only looking at a single agency, for example the CHP, which has a relatively low number of incidents as compared to the Sheriff's Department. A summary of the total number of combined agency incidents is as follows:

Combined Agency Incidents January 2014 – December 2016: 639

Sheriff's Department:

Daytime Incidents (6am-6pm) 2014-Present: 360

Nighttime Incidents (6pm-6am) 2014-Present: 129

Total Sheriff's Department Incidents 2014-2016: 489

CHP:

Daytime Incidents (6am-6pm) 2014-Present: 31

Nighttime Incidents (6pm-6am) 2014-Present: 20

Total CHP Incidents 2014-2016: 51

CalFire:

Daytime Incidents (6am-6pm) 2014-Present: 63

Nighttime Incidents (6pm-6am) 2014-Present: 36

Total CalFire Incidents 2014-2016: 99

Grand Total Daytime Incidents 2014-2017 (All Agencies Combined): 454

Grand Total Daytime Incidents 2014-2017 (All Agencies Combined): 184

Grand Total Incidents 2014-2017 (All Agencies Combined): 639

In summary, over the course of just three years, from January 2014 to December 2016, there have been a **total of 639 reported incidents and accidents** on or near Soda Canyon Road. **That is an average of 213 reported incidents and accidents per year, 18 reported incidents per month, and 4 reported incidents per week on Soda Canyon Road over the three-year period.** Furthermore, the *vast majority of the incidents (454 of 639) took place during the daytime hours*, precisely when the Project will add thousands of drivers to the area. Moreover, during the three-year period, there have been **41 reports of drunk driving on Soda Canyon Road or on Silverado Trail at the intersection with Soda Canyon Road.**

C. Napa County Code Section 18.124.070(C) – Public Health, Safety, and Welfare

Under Napa County Code (NCC) section 18.124.070(C), the Planning Commission or Board of Supervisors “*shall make*” a written finding that “[t]he grant of the use permit, as conditioned will not adversely affect the public health, safety or welfare of the county.”

As indicated above, this Project, if standing on its own, would not appear to pose a serious threat to the public’s health, safety, and welfare. However, in light of all of the winery expansion and development in and around the intersection of Soda Canyon Road and Silverado Trail, this Project cannot be reviewed in a bubble. Instead, the County must step back and review the cumulative impacts of the existing and proposed winery projects on Soda Canyon Road and at the intersection of Soda Canyon Road and Silverado Trail in its determination of whether this Project will adversely affect the public health, safety or welfare.

As outlined above, if all of the proposed projects are approved, that will result in a **147% increase** in the number of annual winery visitors permitted to visit wineries at or near the SCR/ST Intersection, which does **not** account for the additional traffic from general winery operations (employees, business operations, etc.) from the proposed winery projects described above. (See Exhibit 1). Moreover, since 1999, there has already been an **88% traffic increase** (48,472 winery visitors and vineyard workers in 1999 to 78,994 in 2015) from winery visitation and vineyard workers solely from Soda Canyon wineries and vineyards at the intersection Soda Canyon Road and Silverado Trail, and, if all of the above wineries are approved in their proposed form, the total number of winery visitors and vineyard workers who must utilize the SCR/ST intersection to access the respective wineries or vineyards, will increase by **207%**. (See Exhibit 2). Again, these figures do **not** account for other types of traffic (residents, property owners, business operations, etc.), meaning that the 207% increase in traffic at the intersection is in reality much larger.

Combine these increased traffic figures with the existing accidents, incidents, and fires as reported by the Napa County Sheriff’s Office, the CHP, and CalFire on or near Soda Canyon Road, and there is a strong argument that the County’s granting of the Reynolds Family Winery use

permit without either limiting visitation and/or implementing more significant traffic mitigation measures will adversely affect the public health, safety or welfare of the county, and especially the residents and property owners of Soda Canyon Road.

D. Approval of Reynolds Family Winery May Expose the County to Liability

In California, state law imposes liability upon public entities for dangerous conditions of public property. If the County of Napa approves the Project in its current form, and without mitigation measures to address the existing traffic issues at the intersection of Soda Canyon Road and Silverado Trail, the County could be subjecting itself to multi-million dollar lawsuits in the event of any serious accidents or incidents at or near that intersection or on Soda Canyon Road itself that stem from the approval of this Project, or others, which together have adverse cumulative traffic impacts on the intersection and Soda Canyon Road. This, in turn, would then adversely impact the tax-paying citizens of Napa County, as they would ultimately foot the bill in one form or another for mistakes made by the County. As public servants, it is the duty of the County of Napa, and especially its Planning Commissioners and Supervisors, to render decisions that are in the best interests of the citizens of Napa, particularly when it comes to public safety.⁴ Without further traffic mitigation measures, approval of the Reynolds Family Winery expansion, its 16,586 annual visitors to an already dangerous intersection, would be contrary to the public welfare, morals, and best interests of not only Soda Canyon residents and property owners, but also citizens throughout Napa County.

Under California Government Code, section 835,

a public entity is liable for injury caused by a dangerous condition of its property if the plaintiff establishes that the property was in a dangerous condition at the time of the injury, that the injury was proximately caused by the dangerous condition, that the dangerous condition created a reasonably foreseeable risk of the kind of injury which was incurred, and that either: (a) [a] negligent or wrongful act or omission of an employee of the public entity within the scope his employment created the dangerous condition; or (b) [t]he public entity had actual or constructive notice of the dangerous condition under [s]ection 835.2 a sufficient time prior to the injury to have taken measures to protect against the dangerous condition.

As described above, the intersection of Soda Canyon Road and Silverado Trail has seen a dramatic increase in winery and vineyard worker traffic over the last 10 to 15 years. Importantly, for years now, residents and property owners on Soda Canyon have been notifying the County of the dangerous road conditions, numerous traffic accidents, and extreme wildfire danger, yet the County has dismissed all citizen concerns and taken no action other than putting up a few “No Parking” signs and fixing an occasional pothole. In fact, email correspondence dating back several years between various Soda Canyon property owners and several County officials, including

⁴See *BreakZone Billiards v. City of Torrance*, 81 Cal. App. 4th 1205, 1246, 97 Cal. Rptr. 2d 467, 499 (2000) (determining that “[i]n reaching a decision on an application for a CUP it is also appropriate for an agency to consider traffic, parking, safety, noise and nuisance problems; these clearly represent concerns that are well within the domain of the public interest and public welfare.”)

Alfredo Pedroza, Diane Dillon, Rick Marshall, and Bill Dodd, demonstrates their knowledge that Soda Canyon Road is and has been for years in a “deplorable condition” that is “well below” the required Pavement Condition Index (PCI) standard of 70.

In light of the recent fires, not to mention approval of the Mountain Peak Winery project, which will add some 44,275 annual trips to the road, along with this and several other pending winery projects that will significantly increase the amount of traffic at the intersection of Soda Canyon Road and Silverado Trail, it is truly baffling how the County appears ready and willing to continuously approve these projects when it is obvious that the County is aware of how “deplorable” Soda Canyon Road is, how much worse the SCR/ST intersection has become, that there are no near-term funds or plans to improve Soda Canyon Road (and likely the intersection of Soda Canyon and Silverado Trail), and how much worse both locations will become if the Project, along with all of the other proposed projects in the immediate area are approved without more meaningful mitigation measures to address worsening traffic issues.

As this Project pertains to Government Code section 835, the intersection of Soda Canyon Road and Silverado Trail represents a “dangerous condition” of property maintained by the County. Approval of the Project without drastic mitigation measures (e.g. a traffic light), will only exacerbate the dangerous condition because traffic, including the number of inebriated drivers, will unquestionably increase. This creates a foreseeable risk of injury to members of the public. In addition, this letter, along with all of the opposition letters filed in both the instant matter and the Mountain Peak Winery matter opposing the projects and notifying the County of the dangerous conditions of the road, is more than adequate to satisfy both actual and constructive notice of the dangerous condition as required by Government Code section 835.2. In combination, it is entirely foreseeable that if the County approves the Reynolds Family Winery project, and an accident, fire, or other incident resulting in serious bodily injury or death occurs on at the SCR/ST Intersection, and/or on Soda Canyon Road itself, as the result of a visitor, employee, vineyard worker, or truck driver going to or from Reynolds Family Winery, the County could be held liable for millions of dollars in damages for such injury or death.

Unfortunately, in the event of such a tragic event it is the very same citizens and taxpayers who are advocating against this project and the unbridled winery and event center expansion across the Napa Valley who would ultimately have to bear the cost of defending such a lawsuit precisely because the County is funded by taxpayer dollars. This scenario is maddeningly unjust, and I implore the County to consider these potentially devastating consequences while reviewing this application, so that proper mitigation measures can be put in place to alleviate the growing traffic and public safety concerns in and around the intersection of Soda Canyon Road and Silverado Trail stemming from the seemingly endless stream of new projects. To ignore these considerations would be contrary not only to California statutory authority and supporting caselaw, but also the very function of the County as a public office to protect the safety and welfare of its citizens.

E. Conclusion

As noted in the introduction, Reynolds Family Winery is the type of winery I would like to see prosper and succeed. However, in light of the existing traffic and safety issues at the SCR/ST

Intersection and on Soda Canyon Road, I simply cannot offer my full support until the County takes further action to mitigate the cumulative traffic impacts and threats to the public safety and welfare at the SCR/ST Intersection. Again, I would be willing (and in fact would very much like) to withdraw my opposition and instead support the Project if the County 1) significantly reduces the proposed increase in winery visitation, and/or 2) installs a traffic light at the SCR/ST Intersection to alleviate existing and future traffic problems.

Thank you for taking the time to review my letter and please do not hesitate to let me know of any questions or concerns.

Sincerely,
Anthony G. Arger, Esq.
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