

## Attachment F

### Appellants' Request to Overrule Chair's Good Cause Determination

# Robertson, Johnson, Miller & Williamson

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REPLY TO: RENO OFFICE

May 11, 2017

**Napa County Board of Supervisors**  
**Attn: Belia Ramos, Chair**  
**1195 Third Street, Suite 310**  
**Napa, California 94559**  
**Fax: (707) 253-4421**  
**Via Email: [belia.ramos@countyofnapa.org](mailto:belia.ramos@countyofnapa.org)**

**Office of Napa County Counsel**  
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Dear Chair Ramos and Ms. Anderson,

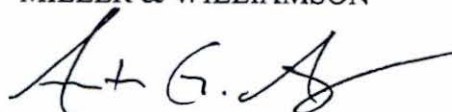
Pursuant to Napa County Code ("NCC") section 2.88.090,

[u]pon a showing of good cause, the chair of the board may authorize a *de novo* review and/or the presentation of additional evidence which could not have been presented at the time of the decision appealed from. This decision by the chair may be overruled by a majority of the remaining board members.

Appellants Kosta Arger, Cynthia Grupp, William Hocker, and Glenn Schreuder (collectively, "Appellants") hereby request a full Board of Supervisors ("BOS") review of several of Chair Ramos' April 3, 2017 good cause determinations. Specifically, Chair Ramos (1) denied Appellants request for *de novo* review, (2) excluded 290 pages of exhibits referenced in the admitted Greg Kamman letter dated January 30, 2017, and (3) denied Appellants' request to augment the record with a geotechnical and geologic review of Soda Canyon Road prepared by KC Engineering. Please be advised that Appellants will seek a review of these determinations by the full BOS at the May 23, 2017 appeal hearing regarding Mountain Peak Winery, and request that this information be provided to the BOS in advance of that date.

Please advise of any procedures regarding such a review, and do not hesitate to let me know of any questions or concerns regarding same. Thank you in advance for your consideration.

Sincerely,  
ROBERTSON, JOHNSON,  
MILLER & WILLIAMSON

  
Anthony G. Arger, Esq.

cc: Brien McMahon, Esq. (via email)