



A Tradition of Stewardship
A Commitment to Service

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AB 720 / TYPE 93 – ESTATE TASTING EVENT PERMIT REVIEW AND APPROVAL PILOT PROGRAM AND INTERPRETIVE GUIDANCE

Purpose

The AB 720 Estate Tasting Event Permit (Type 93) allows qualified holders of existing California Alcoholic Beverage Control (ABC) Type 02 licenses to host limited outdoor wine-tasting events on properties adjacent to licensed premises that they own or control, or on nonadjacent vineyard that they own or control. This memorandum outlines the manner in which a license holder may conduct these events in a manner that upholds the intent of AB 720 while fully preserving all applicable Napa County zoning regulations, Road and Street Standards, and fire and life-safety requirements. This includes continued compliance with ABC regulations and all other applicable state and local provisions.

This permit authorizes special events only on vineyard parcels that do not contain a winery production facility, with eligibility derived from the parcel's valid Type 02 winegrower license. Because these parcels are served by agricultural roads—identified in the Napa County Road and Street Standards as the lowest roadway classification allowed for emergency access—agricultural roads constitute the minimum emergency-access standard for all Type 93 event operations under AB 720. As a result, event activities must be planned and managed to maintain unobstructed emergency-vehicle access, minimize traffic impacts, and ensure safe operating conditions at all times, while also complying with all applicable local land-use, building, fire, ADA, food safety, water, and public health requirements. The permit review and approval process ensures a consistent method for evaluating and managing these limited events, so they do not increase fire risk, impair emergency access, or create public safety hazards.

Pilot Program

This is a pilot program that shall become effective on January 1, 2026, and expire on July 1, 2027, unless extended by the Napa County Board of Supervisors. It is intended to allow the County to gain working knowledge of the details of the Type 93 permit process and validate the County Fire Marshal's Estate Tasting Event Permit review and approval policies and procedures.

General Permit Parameters

Occupancy & Traffic

- **Maximum On-Site Attendance:** 49 persons per event, including staff and guests.
This limit ensures the event remains below California Fire Code assembly occupancy thresholds, minimizing life-safety risks, and does not trigger Napa County Temporary Event requirements.
- **Daily Vehicle Trips:** Must remain below 40 Average Daily Trips (ADT).
This maintains the road's designation as an "agricultural road" under Napa County Road and Street Standards, intended for low-volume agricultural operations with limited public access.
- **Vehicle Circulation & Emergency Access:**
All vehicle circulation must maintain unobstructed emergency access, including a minimum 14-foot clear width and all required turnouts.
- **Event Duration:** Each event must occur within one calendar day and can only be held during daylight hours.

Event Limitations

- **Annual Event Cap:** A maximum of 36 events per calendar year may be conducted under this permit. This limit is intended to ensure that cumulative impacts do not exceed emergency access capacities and do not change the intended land-use intensity established by AB 720.
- **Weather Restrictions:** Events shall not be held during days subject to Red Flag Warnings. Operators are responsible for monitoring National Weather Service and CAL FIRE alerts and shall cancel events if hazardous conditions exist.
- **Use of Structures:** Events are prohibited inside structures that require a permit, including tasting rooms, event buildings, barns, enclosed structures, or temporary structures/tents. All events shall occur outdoors or in non-habitable, approved areas. This ensures a permittee's compliance with AB 720's intent to prevent increased building occupancy and avoids life-safety risks associated with interior assembly uses.
- **Compliance with County Standards:** All events shall comply with Napa County land use regulations, fire and life-safety requirements, and applicable road and street standards.

Other Permits, Approvals, and Compliance

- Approval of this permit by the ABC and the County Fire Marshal does not imply compliance with or approval of any other federal, state, or local rules, regulations, codes, or ordinances.
- Permit holders remain solely responsible for ensuring that all event activities adhere to all applicable laws and regulations.
- Approval of this permit by ABC and the County Fire Marshal does not override or impact the restrictions or limitations of any use permit or winery entitlement for that parcel. For example, ADT and/or number of people in attendance may be less than as stated in these interpretation guidelines if otherwise required by law, use permit, or entitlement.
- The implementation of the review and approval process and interpretive guidance does not create a new regulation.

Local Permit Process

As part of the local jurisdiction review and approval, applicants must submit the following to the Napa County Fire Marshal's Office:

1. Annual Permit Application

- Must be fully completed and signed by the property owner or authorized operator, provide primary and secondary contacts responsible for all aspects of event operations, and be submitted through the Napa County Online Permit Center under Napa County Fire.

2. Valid ABC License

- A copy of a current 02 ABC license that will be used for the 93 ABC license for the premises where tasting activities will occur. All ABC rules regarding service, licensed space control, and staff oversight apply to every event.

3. Fire and Life Safety Acknowledgement Form

Please acknowledge and sign:

- The applicant acknowledges and agrees to comply with all applicable Fire and Life Safety requirements for outdoor events and all permit conditions and limitations set forth in this document.

4. Aerial Site Map

Applicants must provide an aerial site map that clearly shows:

- Property boundaries
- Agricultural and/ or commercial access roads
- Emergency access routes, including minimum 14 ft width, 13'6" vertical clearance, and required turnouts and turnarounds (per County standards)
- Event activity areas
- Parking areas located outside emergency lanes

Permit Term

Duration: Valid for one calendar year (January–December) and must be renewed annually.

Modification, Suspension, or Revocation: The permit may be modified, suspended, or revoked if any of the following occur:

- Changes in conditions on the property
- Average Daily Traffic (ADT) limits are exceeded
- Fire or life-safety requirements are violated
- Events create hazardous conditions for guests or emergency responders

Fees

Napa County Fire Marshal's Office Annual Permit Fee: \$343 flat fee for review, processing, and safety evaluation. This does not include any other fees required by ABC or any other entity.