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Public Comments

Amendments to the Circulation Elements of the Napa County
General Plan and Napa Valley Business Park Specific Plan,
P18-00390-GPA and P18-00301-SPA
Planning Commission Hearing, December 19, 2018

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

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*Making Conservation
a California Way of Life.*

December 7, 2018

SCH # 2005102088

GTS # 04-NAP-2018-00145

GTS ID: 13167

PM: NAP – VAR – VAR

Dana Ayers, Project Planner
Napa County Planning Division
1195 Third Street, Suite 210
Napa, CA 94559

Napa County General Plan Circulation Element and Napa Valley Business Park Specific Plan Amendments - Draft Supplemental EIR (DSEIR)

Dear Dana Ayers:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced plan amendments. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the October 25, 2018 DSEIR.

Project Understanding

Napa County (County) proposes to amend the Circulation Element of its General Plan to update local transportation system information and incorporate current trends, best practices, and regulatory changes in the planning and impact analysis of transportation networks. In correlation with the proposed General Plan amendment and consistent with its objectives of facilitating multiple modes of transportation, the County proposes to amend the Circulation Element of its Napa Valley Business Park Specific Plan (Specific Plan) to modify the design of a primary arterial road in the Specific Plan area by eliminating one vehicle travel lane on a portion of the road and introducing a class 1 multi-use path within the planned right of way (ROW).

Smart Growth

Caltrans applauds many of the goals stated in the various elements of the Circulation Element to be updated, including promoting high-quality and sustainable development, capital improvements to expand the existing bicycle network, implementation of travel demand and trip reduction policies, and a focus on promoting walkable mixed-use and infill development. We suggest using stronger language and policies in a variety of areas to better facilitate future transportation, land use, and infrastructure decisions that align with State and local goals and

policies.

Parking

Parking is a strong influencer in peoples' transportation choices. Dedicated parking (both in-structure and open parking lots) also uses space that might be used for increased residential units. Stronger Parking reduction language would be appropriate to meet Napa's stated goals, along with stated parking maximums (like 1:1) where appropriate, such as in PDAs and along transit corridors. "Unbundling" (parking is sold or rented separately from unit cost) should be required in multi-unit developments. This also makes units more affordable to those who don't need parking.

Caltrans suggests the County establish programs and policies for commercial parking reductions and shared parking, with a goal to reduce open parking lot areas, therefore allowing settled areas to develop more inviting and walkable environments.

Tourism

Wine tourism produces significant economic benefits for the County and State but is also a significant contributor to VMT and other transportation impacts. We are concerned about the direct and cumulative impacts from the expansion of the wine industry and related tourism sector, and that without significant mitigative action, the County's policy goals will not be reachable. We suggest using stronger language than "encourage" in Policy CIR-23: "The County shall encourage the use of public transportation by tourists and visitors and will work with wineries, the local hospitality industry, and the cities and towns to develop incentives that encourage the use of these options and the development of private transit services." We strongly recommend the formation of a Transportation Management Association (TMA) including the most significant trip generating wineries, hotels, towns, and cities, as well as aggressive trip reduction targets with Lead Agency monitoring and enforcement. These strategies could help support the development of improved transit in the region, such as improved Napa Valley Transportation Authority (NVRTA) transit service, rail shuttles utilizing the Wine Train corridor, or hop-on-hop-off circulator shuttles serving popular destinations in the Napa Valley.

The County should study implementing both a fast, convenient transit service from San Francisco to Napa, so tourists aren't forced to rent cars to reach their destinations, and a bus/transit loop that stops at the most visited wine and hospitality destinations. This could be modeled on the hop on/off bus services that run in most major cities. Such a service could also benefit the employees of wineries and hospitality sites, especially if paired with express bus service from residential areas.

Multimodal Planning

We suggest the following changes to policies which will better facilitate the development of multimodal and active transportation facilities:

- CIR-22: Add "including bicycles and electric-assist bicycles" to "A purchasing program that favors hybrid, electric or other non-gasoline vehicles," and change "demonstrate

- leadership” to develop county policy or specific goals;
- CIR-31: remove “newly” from “abandoned railway...”; and please include language noting that bike pedestrian facilities can be added to non-abandoned railroad ROW as well, noting the County will negotiate with railroads where appropriate.
 - CIR-36: Add language about requiring pedestrian-scale lighting on sidewalks and paths.

Transportation Impact Analysis

The Transportation Impact Analysis for the General Plan Update, and associated projects should be conducted using current data and methodology. Furthermore, Caltrans is switching to VMT as its metric for transportation impacts. We suggest that the lead agency also adopt VMT and establish VMT thresholds for the proposed General Plan Update and its associated projects.

Analysis of alternatives should discuss buildout of potential transit improvement projects proposed for the horizon period of this General Plan Update. This should address future rapid-bus service in Napa Valley or expanded rail service along the Wine Train corridor.

Transportation Impact Fees

We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Please identify in text and graphics existing and proposed improvements for the pedestrian, bicycle, and transit networks. The City should estimate the cost of needed improvements, expansion, and maintenance for the Plan area, as well as identify viable sources of funding, correlated with the pace of improvements, and a scheduled plan for implementation along with the DSEIR.

Lead Agency

As the Lead Agency, the County of Napa is responsible for all project mitigation, including any needed improvements to the STN. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Dana Ayers, County of Napa
December 7, 2018
Page 4

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or jake.freedman@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

From: [Eve Kahn](#)
To: [Ayers, Dana](#)
Subject: Draft Circulation Element
Date: Wednesday, July 25, 2018 2:34:11 PM

Table CIR-B Origins & Destinations of Vehicle Trips in Napa County

I have to question the % of pass thru trips. Previous Circulation Element was 14% and now we only have 3%. Can you tell me what day(s) in Dec were used?

I live in Browns Valley and get on/off Hwy 12/121 often. I see long lines of cars headed Eastbound that turn South (away from Napa County) and long lines of cars headed to Jamieson Canyon. Reverse is true. Appears to be more than 3% during commute hours. In 2008 the estimate for the % travelers in 2030 was an increase from 14 - 24%. So 3% is a huge reduction.

Are there other reports that support the 3%?

Many thanks, Eve

From: [Dustin Owen](#)
To: [Ayers, Dana](#)
Subject: Skellenger
Date: Thursday, June 28, 2018 8:05:18 AM

Dana,

I'm a daily commuter from Napa to Angwin and recently the Skellenger problem has seemed to drastically increase where now around 330pm there's a huge backup almost to Mumm. This wouldn't be that big of a deal without the people that cut over on Skellenger and add to the backup. Yesterday I had perfect traffic all the way to Skellenger until a car pulled out in front of traffic and caused a mini traffic jam that extended about 20 cars back. This is basically how the afternoon traffic jam starts, one car sets off a chain traffic jam that snakes back until traffic is basically stopped.

What if we put a sign right at the intersection of Silverado and Skellenger so that the people waiting at Skellenger to get on the trail read it and are aware that they are the ones causing the backup. Maybe something like "Wait until a clear gap to merge into traffic and match speed ASAP" Or something like that??? I feel like if these people know they are the ones causing the traffic they'd stop.

Hope that helps,

Dustin

From: [Eve Kahn](#)
To: [Ayers, Dana](#)
Subject: General Plan Circulation Element Update
Date: Sunday, June 24, 2018 1:10:36 PM

Last week at the Board, one of the supes wondered why no one was attending/interested in the Circulation Element. Good question. I went to the County's website and searched under Major Projects - but found nothing. I did a general search and found a draft dated March 2018 but nothing else. Playing sleuth, I looked through the Planning Commission agendas until I found a study session on May 2nd. Honestly, it shouldn't be this difficult to locate - and am hoping this effort is more visible with expanded outreach in the coming months. Will there be opportunities for UpValley residents to participate?

The staff report indicated the comment period was closed on June 1st. I did not see any outreach after the PC hearing - so I am hoping there is still an opportunity to comment. If not, then I hope my comments get passed to Fehr & Peers for consideration in the next draft.

Questions/Comments regarding Draft Circulation Element Document dated March 2018.:

1. Why are the definitions of traffic terms missing?
2. Most of the narrative and recommendations seem to be focused on wineries with little or no mention of tourist traffic to hotels nor commute traffic to major employers like hospital/medical, education, or government facilities. [Action Item CIR-8.1 and Policy CIR-23 are good examples]
3. Given the expansion of wineries, I believe Soda Canyon and Atlas Peak should be added to the list on page 8.
4. Old Sonoma Road is a relatively new, and important, Rural Collector and should be listed on page 11.
5. Part of Policy CIR-7 (page 12) is totally unrealistic. How can Napa county discourage pass-through commuter traffic by increasing supply of affordable housing? If people live in Solano and work in Marin or Sonoma, as an example, housing in Napa is more expensive than where they live today. And if they live in Marin or Sonoma and work in Solano, Yolo, or Contra Costa, most likely affordable housing is not the issue at all. I suggest you drop the "increasing the supply and affordability of housing" and retain the "designing the roadway to meet local needs" - which is very relevant.
6. Action Item CIR-20.1 (page 16) specifies harvest season for implementing ride-sharing or ride-matching. These are excellent alternatives. Why only limit to harvest? Why limit only to wineries? Suggest adding these two options to Action Item CIR-20.2 as well.
7. Policy CIR-27 has a long list of improvements. Consider widening SR 221 between SR12 & SR 121 would be a lot clearer if stated as SR221 between SR12/29 and SR 121. I urge stronger language in the option "Work with relevant agencies to investigate options for synchronizing traffic signals" Please stop investigating and lets make it happen!

Thanks and regards, Eve



Chuck McMinn
Board President

Philip Sales
Executive Director

Nancy Tennyson
Administrative Assistant

Tammy Saunders
Volunteer Coordinator

June 18, 2018

David Morrison, Director
Planning, Building and Environmental Services
1195 Third Street
2nd Floor
Napa, CA 94559

Ref: General Plan Circulation Element Update

**NAPA VALLEY VINE TRAIL COALITION
BOARD MEMBER ORGANIZATIONS**

LAND INTEREST GROUPS

- Napa Valley Vintners (co-founder)
- Napa Valley Grapegrowers (co-founder)
- Land Trust of Napa County (co-founder)
- Napa County Farm Bureau
- Winegrowers of Napa County

PUBLIC AGENCIES

- Napa Valley Transportation Authority (NVTA)
- City of Vallejo/Solano County
- NVTA/TAC Public Works Planners
- Active Transportation Advisory Committees of Napa County (ATAC)
- Napa County Regional Park & Open Space District
- California Department of Fish & Wildlife
- Napa County Law Enforcement
- Napa County Sheriff's Department
- City of Napa Police Department
- California Highway Patrol
- Napa Valley College
- Caltrans District 4

ECONOMIC INTEREST GROUPS

- Visit Napa Valley
- Napa Valley Chambers of Commerce
- Calistoga Vitality Group
- Cycling Businesses of Napa Valley
- North Bay Realtors/Napa Group

ENVIRONMENTAL INTEREST GROUPS

- Sierra Club Napa Group
- Sustainable Napa County
- Friends of the Napa River

**CULTURAL & COMMUNITY
INTEREST GROUPS**

- Napa County Bicycle Coalition
- Health, Wellness & Medical Coalition
- Youth Development/Safety Education
- Runners of Napa Valley
- Rotary Clubs of Napa Valley
- Arts Council Napa Valley

Dear Mr. Morrison:

I have reviewed the Draft Circulation Element of the General Plan update and have several suggestions and recommendations regarding the Vine Trail and other multi use trails within Napa County.

As you are aware, since the Vine Trail opened in August 2016, it has provided residents of Napa County an alternative to Highway 29 between south Napa and Yountville.

At the beginning of 2017, the Vine Trail Coalition installed three automatic bicycle and pedestrian counters on the trail approximately 4 miles apart. The data collected in the past year reveals that separated, safe and scenic multi-use trails can contribute significantly to reductions in greenhouse gases, vehicle miles travelled and automobile dependence. The recent growth in popularity of the electric assist bicycles is also encouraging bicycle commuters to travel further.

Napa Valley Vine Trail Users Jan 2017-Jan 2018				Percentages	
Location	All	Pedestrians	Cyclists	Peds	Cyclists
Tulocay	152,534	81,852	70,682	53.7%	46.3%
Oak Knoll South	87,451	27,446	60,005	31.4%	68.6%
Oak Knoll North	108,455	22,532	85,923	20.8%	79.2%
	348,440	131,830	216,610	37.8%	62.2%

Days of Week	Percentages
Weekends	39%
Weekdays	61%
	100%

The automatic bike and pedestrian counters recorded 348,440 uses of the Vine Trail. This is equal to 174,220 round trips or equivalent to removing 477 Single Occupancy vehicles per day from the Highway 29 corridor. It should be noted that the AADT in the segment of SR 29 between Redwood Road/Trancas and California Drive is between 63,000 and 32,000.

Over 18,000 students attend educational institutions within a half a mile of the existing Vine Trail. The Vine Trail provides an alternative to car pools, buses, and other automobile forms of transportation.

The Vine Trail also serves locals. Intercept zip code surveys conducted by the Vine Trail on a quarterly basis indicate that 79% of Trail users are locals. This number mirrors the estimate of locals versus tourists from automobile studies.

I believe that there should be stronger emphasis in the General Plan update on constructing future sections of the Vine Trail and a stronger commitment to maintaining the Vine Trail as an alternative transportation corridor. I attach my comments in mark up form to the text provided.

Sincerely,

A handwritten signature in blue ink, appearing to read "Philip Sales", with a large, stylized flourish above the name and a horizontal line underneath.

Philip Sales
Executive Director

Cc Chuck McMinn, NVVTC Board President

Active Transportation

The Napa Valley Vine Trail is an off-street multi-use (bicycle/pedestrian) path for commuters and recreational riders between Yountville and Napa. It is planned for the Trail to eventually connect all five municipalities in Napa County, as well as Vallejo in Solano County, and to include portions of the region-wide Bay Trail and Ridge Trail.

Regional separated multi-use paths provide commuters with alternatives to motorized transportation. The growth in popularity of electric bikes encourage trail users to travel longer distances. In Napa County over 18,000 students attend schools within half a mile of the Vine Trail between Kennedy Park Napa and Yountville. Since its opening in 2016, data on the 12.5-mile-long Vine Trail has been collected using automatic bike and pedestrian counters installed approximately 4 miles apart. In the first full year of operation there were 348,440 uses of the Vine Trail as recorded by the counters. This is equal to 174,220 round trips or equivalent to removing 477 Single Occupancy vehicles off the Highway 29 corridor.

In Napa County, protecting the rural character of the area and minimizing the cost of new road expansion are both priorities. Consequently, building new or wider roads has been limited to only a few locations where deemed to be both feasible and desirable. Attractive public transit alternatives are also difficult to implement, due to the dispersed pattern of employment and tourist destinations, and services with low numbers of riders typically require substantial government subsidy. In the more developed (and flatter) Napa Valley, traveling without a private vehicle is more feasible and the potential exists to encourage drivers to use their cars less, supporting the County's long-held commitment to urban-centered growth. Adding connector trails to the main spine of the Vine Trail can provide a non-motorized alternative to many neighborhoods and communities.

Land Use and Development

Policy CIR-5: The County supports a coordinated approach to land use and circulation planning that increases opportunities for physical activity and promotes public health by prioritizing implementation of improvements to active transportation modes and encouraging mixed-use developments that locate complementary uses within reasonable walking or bicycling distance of each other such as the Vine Trail.

Policy CIR-11: Facilities supporting multi-modal access, including but not limited to designated areas for pick-up/drop-off activities, shall be integrated into the site layout of development projects, frontage improvements, and public projects, wherever such facilities are appropriate and can be physically accommodated. The Countywide Bicycle Plan and Countywide Pedestrian Plan shall be referenced in determining appropriate bicycle and/or pedestrian treatments at specific locations. Where a site abuts

or is close to the Napa Valley Vine Trail, the developer shall be required to make a connection and construct sections of the Vine Trail. Amenities serving public and private transportation providers and multi-modal connections between private properties are encouraged, particularly in circumstances where such amenities and connections could provide an alternative to vehicular travel on public roadways and where the amenity or connection would reduce VMT.

Transportation Demand Management

Page 16

Policy CIR-22: As a major employer, the County of Napa shall demonstrate leadership in the implementation of programs encouraging the use of transit, walking, and bicycling by its employees, as well as the use of alternative fuels. Example programs may include:

- Preferential carpool parking and other ridesharing incentives;
- Flexible working hours or telecommuting where consistent with job duties and customer service needs;
- A purchasing program that favors hybrid, electric, or other non-gasoline vehicles;
- Assisting in the development of demonstration projects for alternative fuel technologies such as ethanol, hydrogen, and electricity;
- Secure bicycle parking; and
- Transit incentives.
- Funding the construction and maintenance of those sections of the Vine Trail that connect to County offices

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Transportation Improvements

Page 17

Policy CIR-25: The planning and design of all County transportation facilities shall comply with the County's adopted Complete Streets Policy (Resolution 2013-01), which expresses the County's commitment to a transportation system that serves users of all ages, abilities, and modes of travel, that is sensitive to the local context, and that applies the best available design guidelines and standards. Recommendations contained in relevant bicycle, pedestrian, transit, and other multi-modal plans shall be incorporated, and transportation projects shall be reviewed by the relevant Advisory Committee(s) early in the planning stage to ensure accommodation of Complete Streets features

Pages 17 and 18

Policy CIR-27: The County seeks to provide a roadway system that maintains current roadway capacities in most locations and is efficient in providing local access. The following list of improvements, illustrated as the County's ultimate road network in Figure CIR-1, has been supported by policy makers within the County and all five incorporated cities/town. Some of these routes are controlled by other agencies

(such as Caltrans or a city); in those cases, the County will coordinate with the other agencies to plan and implement these improvements.

Deleted: .

- Construct an interchange or other grade-separated facility at the intersection of State Route 12, Airport Boulevard, and State Route 29 (“Airport Junction”), within the most efficient footprint, to increase capacity and reduce vehicle conflicts.
- Improve the intersection of SR 221/SR 12/SR 29 (“Soscol Junction”) to increase capacity and reduce vehicle conflicts. • Improve the intersection of SR 12/SR 121/SR 29 (“Carneros Junction”) to increase capacity and reduce vehicle conflicts.
- Consider widening SR 221 between SR 12 and SR 121 to improve traffic flow.
- In coordination with the City of American Canyon, consider widening or other improvements to SR 29 between SR 221 and the Solano County line to improve traffic flow.
- In coordination with the City of American Canyon, relieve traffic congestion along SR 29 by completing reliever routes; examples include the completion of Devlin Road between Soscol Ferry Road and Green Island Road, and evaluating the potential to connect Newell Road to South Kelly Road.
- Work with relevant agencies to investigate options for synchronizing traffic signals to improve traffic flow and reduce vehicle emissions.
- Explore opportunities for operational improvements along SR 29 and along Silverado Trail to reduce conflicts and improve traffic flow; examples may include center two-way left-turn lanes, additional turn lanes at intersections, consideration of roundabouts, and other measures that could reduce vehicle conflicts.
- Consistent with the Countywide Pedestrian Plan and the Countywide Bicycle Plan, install safety-related improvements on rural roads and highways, such as new signals, bike lanes, bikeways, shoulder widening, or softening sharp curves.

- Construct sections of the Vine Trail in the unincorporated areas of the County. Work with other agencies and jurisdictions to ensure that funding for the Vine Trail projects is available.

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Pedestrian and Bicycle

Page 19

Policy CIR-30: Bicycle facilities consistent with the Countywide Bicycle Plan shall be added to County roadways when repaving or upgrading of the roadway occurs. Where existing right-of-way is insufficient, the County shall require dedication of adequate right-of-way and, if appropriate, installation of the facilities at the property frontage as conditions of discretionary permit approval. The County shall encourage Caltrans to follow these same guidelines on state highways in Napa County. Policy CIR-31: It is recognized that separated bicycle and pedestrian facilities such as the Vine Trail provide not only opportunities for commuters and the recreational user, once constructed they will provide a safer and healthier infrastructure to roads. It is already proven that the high user volumes on multi-use (bicycle and pedestrian) paths when constructed and linking urban areas have great benefits in terms of VMT.

greenhouse gas reductions and healthier lifestyles for residents. Where they are not needed for other transportation purposes and where such use would implement the Countywide Bicycle Plan or other County-adopted master plan, newly abandoned rail rights-of-way shall be considered for alternative uses such as public transit routes, bicycle paths, or pedestrian/hiking routes, provided that they are compatible with adjacent uses and sufficient funding is available for right-of-way acquisition, construction, and long-term maintenance.

Vehicle

Pages 21 and 22

Policy CIR-38: In support of state and regional goals to reduce greenhouse gas emissions and encourage active transportation modes, the County will implement programs to reduce the number of vehicle miles traveled (VMT) on local roadways and regional routes in the County. In addition to those TDM strategies to reduce single occupant vehicle use listed in Policy CIR-19, the County will support measures that eliminate or reduce the length of vehicle trips. Such measures could include:

- Increased efforts toward construction of affordable and workforce housing units, and additional incentives for construction of farm labor housing in the County;
- Coordination between local agencies, including local chambers of commerce, the County, cities and town, to facilitate business partnerships and interconnectivity using shared transportation facilities, such as shuttles;
- Increased parking reductions from that currently allowed in the zoning ordinance, for any two or more developments that offer opportunities for pedestrian activity between them, such as shared parking lots and privately-maintained pedestrian paths;
 - Construction and maintenance of the Napa Valley Vine Trail in the unincorporated areas to connect Yountville to St Helena, St Helena to Calistoga and Napa to American Canyon.
- Transportation system impact fee incentives for discretionary and private development projects for which the County and project applicant agree that the applicant will construct planned pedestrian and bicycle transportation facilities, including but not limited to bicycle lanes and multi-use paths.

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Comment from City of Calistoga staff (Kevin Thompson, Senior Planner):

On the Circulation Map the County identifies Petrified Forest and Myrtdale as collectors. Our Circulation Map identifies them as Arterials. Please be consistent with our circulation element and reclassification to Arterial – especially for Petrified Forest Road.

Comment from Town of Yountville staff (Sandra Liston, Planning & Building Director):

We would like to see consideration given to extending Big Ranch Road to the north to connect at Yountville Cross Road.

Comments from Winegrowers of Napa County (Michelle Benvenuto, Executive Director):

Page 6 of 23, last paragraph on page: Delete the word “significant” from the paragraph, and delete the number “500.” Revise the last sentence to reflect a 2017 Visit Napa Valley survey that indicated a total of 3.5 million visitors to Napa County, and clarify that these visitors were not just attracted to wineries but also to the area’s scenery, music venues and events (e.g., jazz festivals, Bottlerock), spas and restaurants. Consistent with this last revision, revise the first sentence of the last paragraph on page 7 of 23 to reflect the variety of other visitor attractions in the county, or else provide the data that supports the statement that “most of the county’s visitors come to visit wineries.”

Table CIR-B: Data in table does not match data provided in Table 14 of the 2014 Travel Behavior Study facilitated by NVTA.

May 31, 2018

Ms. Dana Ayers
Planning, Building, and Environmental Services
1195 Third Street, 2nd Floor
Napa, CA 94559

Comments on the Draft “Updated Transportation Impact Study Guidelines” for Napa County, Prepared by Fehr & Peers, dated April 20, 2018.

Dear Ms. Ayers:

Thank you for the opportunity to review the “Draft Update of the Transportation Impact Study Guidelines” for traffic studies in Napa County. We offer the following comments based on our reading of the draft guidelines as well as the “Guidelines for Application of Updated General Plan Circulation Policies on Significance Criteria Related to Vehicle Level of Service” document. Our comments are intended only to help provide assistance for you in the decision making process regarding the Guidelines.

Our comments include the following:

- Please clarify that the significance criteria for minor-street stop controlled intersections do not apply to private driveways/roadways, but rather only public street intersections.
- One of the unique characteristics of the Napa Valley is the preponderance of low volume minor-streets or driveways intersecting State Route 29 and Silverado Trail that function at poor levels of service due to the high volumes on the major roads. The Guidelines define a significant impact if an intersection at LOS E-F experiences a 10% or more increase to the stop controlled minor-street volume.

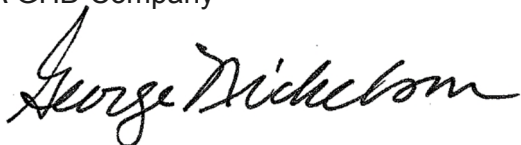
The significance criteria for minor-street stop controlled intersections appear to disproportionately penalize locations that have a low side street approach volume. For example, an approach with 10 peak hour trips could be significantly impacted by 1 added trip where the major street volumes are high enough.

Seen another way, low volume approaches are subject to greater percentage increases compared to higher volume approaches with an equal number of added trips. For example, 10 trips added to an approach with 100 trips equals a 10% increase (significant impact), whereas 10 trips added to an approach with 200 trips equals a 5% increase (not significant). Yet the approach with 110 total trips functions better than the approach with 210 total trips.

The lower the minor-street volume is, the better it operates, thus it seems, it should be able to add more trips instead of fewer. For this reason, it seems that a higher project trip allowance should be provided for low volume approaches. Possibly consider a tiered volume method to measure minor-street stop controlled impacts.

Thank you again for the opportunity to comment on the Draft Transportation Impact Guidelines.

Sincerely,
Omni-Means,
A GHD Company

A handwritten signature in black ink that reads "George Nickelson". The signature is written in a cursive style with a large initial "G".

George W. Nickelson, P.E.
Senior Project Manager





June 1, 2018

David Morrison, Director
Napa County Department Planning, Building & Environmental Services
1195 Third Street, 2nd Floor
Napa, CA 94559

Dear Mr. Morrison,

Thank you for the opportunity to provide comments on the March 2018 draft Napa County General Plan Circulation Element.

There is an inverse relationship between workforce housing and traffic congestion. Where one increases, the other decreases. Moreover, commuters – and their greenhouse gas emissions - don't stop at jurisdictional boundaries.

The juxtaposition of these issues is particularly acute in American Canyon, where more than 75% of the traffic on Highway 29 neither begins nor ends here. Not only does this traffic congestion harm the residents and businesses in all of southern Napa County, it slows residents, visitors and commerce traveling to northern County destinations.

In reviewing the draft Circulation Element, we note new vehicle miles travelled (VMT) reduction transportation impact policies (Policies CIR-39 and CIR-40). In addition, we suggest it may be appropriate for the County to strengthen these policies by noting their linkage to Policy CIR-3 and pointing out that concentrating urban development within existing cities and towns where sufficient densities can support transit services and pedestrian and bicycle facility development may achieve VMT reductions from a countywide perspective. Moreover, we suggest Policy CIR-3 be revised as follows.

*Policy CIR-3: Consistent with urban-centered growth policies in the Agricultural Preservation and Land Use Element, new residential and commercial development shall be concentrated within existing cities and towns and urbanized areas, **particularly within Priority Development Areas (PDA's)**, where sufficient densities can support transit services and development of pedestrian and bicycle facilities.*

We also suggest new Action Item CIR 3.1 as follows:

Action Item CIR-3.1: Partner with jurisdictions who have PDA's to leverage creative funding tools such as property tax increment financing in order to fund and implement the improvements listed in Policy CIR-27.



To further the point, VMT reductions may also be gained by integrating multi-modal circulation improvements that serve the Broadway District Priority Development Area (PDA) in American Canyon with the County's Airport industrial Area. These "South County Corridor Congestion Management Plan" improvements identified in Policy CIR-27 provide critically-needed extensions to Devlin Road and Newell Road. These multi-modal investments reduce VMT by making it convenient for people to live in the Broadway District PDA and work in American Canyon and the unincorporated Napa County Airport Industrial Area. A map of these improvements is attached and is recommended to be included the Circulation Element. Also, it is recommended that Action Item 27.2 be revised as follows:

*Action Item CIR-27.2: In coordination with NVTA and Caltrans, develop a South Napa Congestion Management Plan to coordinate improvements along SR 29 between the Solano County line and SR 221, to address **congestion caused by existing traffic volumes, as well the impacts of future growth and demand, including the diversion of traffic that may be** created by the potential conversion of SR 37 to a toll road.*

Napa County's Circulation Element recognizes that traffic volumes on existing roads (within American Canyon and elsewhere) will increase from a variety of "home-grown" sources including many tourists who visit more than 500 wineries and world-class restaurants and hotels in the unincorporated County. In 2013, when American Canyon adopted its new Circulation Element, we committed to fund road improvements and our fair share of Highway 29 improvements. Our Traffic Impact Fee meets that commitment and we encourage the County is planning for the same. We note Action Item CIR-6.1 (the development of a countywide transportation impact fee) is carried forward from the prior Circulation Element, and we are willing to share our expertise with the County as it moves forward with implementation of this particular item in the Circulation Element.

In closing, much like the issue of workforce housing, a Regional Approach to traffic is clearly needed in Napa County. With policy guidance in the new Circulation Element, American Canyon welcomes working with Napa County to reduce VMT and GHG by integrating jobs/housing mobility needs between the Broadway District PDA and the Napa County Airport industrial Area.

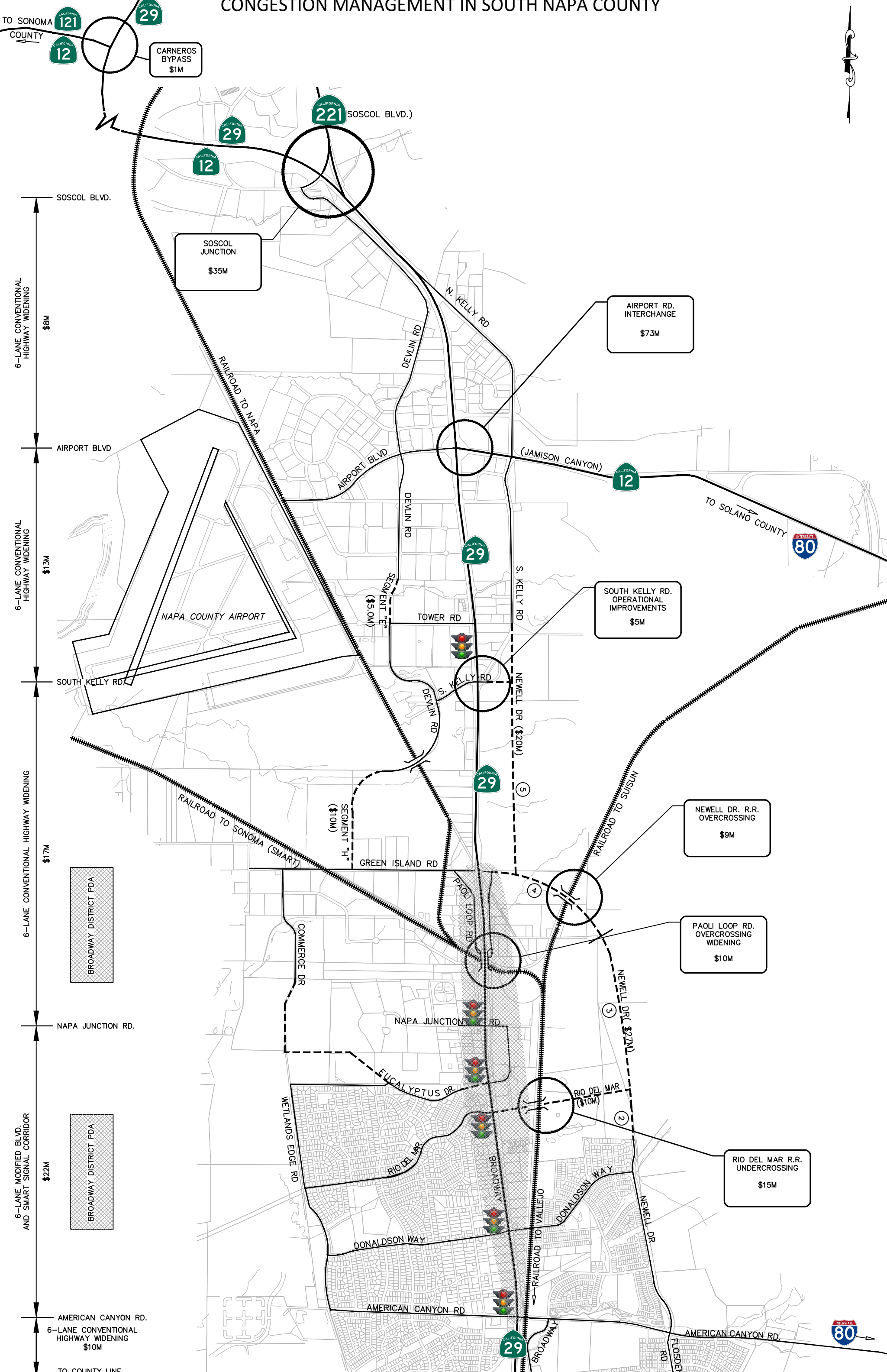
We look forward to meeting with you to further discuss Napa County's commitment to fund economical and environmentally beneficial mobility improvements in Southern Napa County.

Sincerely,

A handwritten signature in black ink that reads "Jason B. Holley". The signature is written in a cursive, flowing style.

Jason B. Holley
City Manager

CONGESTION MANAGEMENT IN SOUTH NAPA COUNTY





napa valley vintners

May 31, 2018

David Morrison
Napa County Planning, Building and Environmental Services Director
1195 Third Street, Second Floor
Napa, CA 94559

SUBJECT: NVV COMMENTS ON NAPA COUNTY CIRCULATION ELEMENT

Dear Mr. Morrison:

The Napa Valley Vintners (NVV) is a non-profit trade association comprised of nearly 550 Napa Valley wineries, which represents the backbone of our local economy. A vintner task force has reviewed the March 2018 draft of the Napa County Circulation Element and appreciates having the opportunity to comment on it.

The work of the NVV is guided by a three-year strategic plan, which includes a tremendous amount of input from the membership. Presently we are midway through the first year of a new plan whereupon local wineries have expressly called out traffic as the top concern facing their businesses and the industry overall.

As Napa County residents are aware of, and the draft circulation element reinforces, we won't be able to "build our way out" of our local transportation and congestion issues here, due to the small size of our county and the agricultural nature of it.

The two resources our community does have, which are underutilized yet have the capacity to reduce the reliance strictly upon single occupancy automobile travel are the Napa Valley Wine Train rail corridor and the Napa Valley Vine Trail.

The County should implement Action Item CIR-6.1 (countywide transportation impact fee) and the money should be invested into programs and projects that are only used to reduce the reliance upon single occupancy vehicle travel within Napa County. Among the programs and projects the County may want to help fund with these fees include a light rail service for both commuters and visitors, subsidized bus/shuttle/van pool service and the Napa Valley Vine Trail.

Light Rail

Rail infrastructure presently exists between the Vallejo Ferry Terminal north to Charles Krug winery between St. Helena and Calistoga. That resource is currently owned by the Napa Valley Wine Train, whose management has recently been exploring the viability of commuter service. The Fehr & Peers study done for the County in 2014 showed that nearly 80% of the cars on our roads are Napa Valley residents getting to and from work. **The County should work with the owners of the Wine Train to explore the possibility of light rail service that would get workers up and down the valley at a reasonably affordable cost**, while charging visitors a higher “hop on, hop off” fee to do the same. There would ideally be shuttles in each of the towns that assist in getting light rail riders from the drop off point to the wineries, restaurants and other places of employment in that area. This would allow employees to get to work, and allow visitors that would like to explore the Napa Valley to do so without a car.

The Napa Valley Vine Trail

In 2008, the NVV, along with the Napa Valley Grapegrowers and the Land Trust founded the Vine Trail Coalition. The Napa Valley Vine Trail will be a 47-mile walking & biking trail system to physically, artistically and culturally connect the entire Napa Valley from Calistoga to the Vallejo Ferry and the greater Bay Area. The Vine Trail has come a long way in the decade since its establishment. **The County should include a specific policy and action item within the Circulation Element that calls for the completion of the Napa Valley Vine Trail within the timeframe of the present General Plan.** Not only was the NVV a founder of the Vine Trail, we also joined with Visit Napa Valley in 2014 in each donating \$2.5 million to the Napa Valley Vine Trail Coalition. It would be shortsighted of the County not to specifically include the completion of the Napa Valley Vine Trail as a dedicated policy and action item in the Circulation Element.

Upper Napa Valley

The lack of options to improve traffic circulation north of Yountville and the willingness to live with service levels D, E and even F are troubling. As a commuter myself, I know I am part of the problem. However, in the 20 years I have traveled daily from Browns Valley in Napa to St. Helena, I have seen the drive time double. **The NVV believes that two ideas considered in the draft Circulation Element should be vigorously pursued to help ease congestion in the upper Napa Valley: roundabouts and synchronization of traffic signals.** An additional thought the County should explore is closing Skellenger Lane during peak commute hours, as what turns into a selfish shortcut for some backs up traffic for many others on the Silverado Trail.

Roundabouts

The County should implement an Action Item whereupon every crossroad intersection on the two main upvalley thoroughfares, Highway 29 and the

Silverado Trail, should be investigated to see if it may accommodate a roundabout and, where feasible, install at least one as soon as possible, but within the timeframe of the current general plan at a minimum. It is time to stop having hypothetical discussions about the potential pros and cons and instead to implement a roundabout to collect real data. Not only would this keep traffic flowing, it would also reduce the number of unsafe crossings from the cross roads and the resulting automobile accidents. In Policy CIR-27, replace the word "consideration" of roundabouts to "implementation."

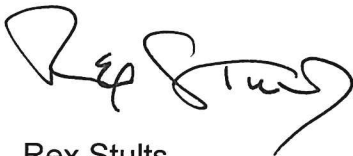
Synchronization of Traffic Signals

This seems like an easy fix, not only in the upper Napa Valley, but countywide. Ideally, the ongoing monitoring of the success of this Action Item would be done by the County rather than CalTrans. In particular, the NVV would like to see an evaluation of the traffic signal on Highway 29 at Madison Street in Yountville as many believe traffic would flow more smoothly during morning and afternoon commute hours if that signal was green for Highway 29 travelers.

Finally, as noted in the draft Circulation Element, much of the traffic congestion we face in the Napa Valley is a result of a lack of housing that is affordable to our workforce. Therefore, any additional efforts the County, in conjunction with our local municipalities, can do to address that equally compelling need would be beneficial to the community.

The NVV regularly conducts community polls to identify top concerns of our county citizens. Infallibly, traffic and a lack of housing that is affordable are the top two concerns of locals. We applaud the County for moving forward with the Circulation Element, and more importantly, taking action to address these issues rather than continuing to debate them. We stand ready to partner with you to improve our community in these critical areas.

Sincerely,



Rex Stults
Government Relations Director

Copy: Napa County Planning Commission



May 29, 2018

Ms. Dana Ayers
County of Napa
Planning Department
1195 Third Street, Suite 210
Napa, CA 94559

RE: Draft Circulation Element Comments

Dear Ms. Ayers:

The Napa Valley Transportation Authority (NVTA) serves as the Congestion Management Agency for Napa County. Currently, one of the Napa County Supervisors, and member of the NVTA Board represents the County's jurisdictions on the nine-county Bay Area Metropolitan Transportation Commission (MTC). As part of MTC, NVTA serves as the programming entity for various sources of Federal and State funds. One of the unique characteristics of NVTA is that the agency also acts as the transit provider for all jurisdiction of Napa County.

The Napa Valley Transportation Authority has the following comments on the draft General Plan Circulation Element dated March 2018.

Any reference to "VINE" should be changed to "Vine" as it is no longer an acronym.

Page 3 Public Transit

The Napa Valley Transportation Authority operates all of the services in Napa Valley. The various brands are specific to services and should not be referred to as "operators," instead should read Vine Transit. American Canyon Transit is on-demand service with the exception of a.m. and p.m. peak periods where fixed route service is provided. St. Helena shuttle provides on demand service with the exception of a.m. and p.m. peak periods where fixed route service is provided.

Page 3 American Canyon Transit

The American Canyon Transit should mention that the service also provides on-demand, door-to-door and fixed-route service in American Canyon.

Page 4 Active Transportation

The draft plan references the update to the Countywide Bicycle Plan. NVTA requests that the county also reference the Countywide Pedestrian Plan which was completed in August of 2016. Combined, the two documents make up the Countywide Active Transportation Plan.

Page 4 Paratransit

VINE GO, Vine Transit's paratransit service should read "VineGo." The description should read, "VineGo is the Vine's complementary ADA paratransit service providing curb-to-curb service for qualifying residents living within ¾ of a mile from any Vine service.

Page 4 Public Transit

Consider including ridethevine.com link (NVTA link is included)

Page 4 Rail Transportation

The plan should mention that the Sonoma Marin Area Rail Transit (SMART) alignment ends at Green Island Road in American Canyon and that the NVTA is in discussions with the other three north bay congestion management agencies and SMART to launch a feasibility study to evaluate extending the SMART operations to the Suisun Amtrak/Capitol Corridor station.

Page 5 Rail Transportation

Typo: "Streblo" should read Streblow

Page 6 Transportation Issue Facing the County

The last paragraph states "a significant amount of traffic [is] generated by the many tourists who visit the County". Most of the traffic is generated by workers coming in from outside the county or commuting out from inside the county or commuting between jurisdictions within the county. Only 21% of all trips are actually tourists trips, according to the Travel Behavior Study that was jointly funded by NVTA and the County of Napa. The study also notes that most of the trips are internal (55%). It should be noted that NVTA just launched another travel behavior study in preparation for the upcoming countywide transportation plan update and that study will be published at the latter part of the calendar year or early 2019.

Page 6 Transportation Issues Facing the County

Consider sentence revision on commuters from outside being from the Bay Area (Napa County is in the Bay Area-revise to "other parts of the Bay Area or Sacramento region"

Page 7 Travel Behavior Table

Table CIR-B should reference the table in the Travel Behavior Study where the information is being extrapolated from.

Page 8 – Second Bullet on Transit Ridership

Your statement "Higher levels of congestion can be associated with higher transit ridership". This should be correct to state that "lower levels of congestion can be associated with higher transit ridership". Also, you might wish to note that NVTA recently completed an express bus study and is working on improvements to make the system more effective and more frequent.

Page 9 Last paragraph eludes to travel without a vehicle, but neglects to mention active modes of transportation (biking/walking) as alternatives

Page 11 – Goals

The County may wish to consider safety in its goals given the county's accident rate.

Page 12—Policy CIR-6

The Transportation Analysis should also be consistent with the Countywide Transportation Plan.

Page 13

Policy CIR-12-Include biking to nearest transit along with walking.

Page 14 – Action Item CIR-18.1 – NVTA produces a countywide transportation plan (CTP) and does not have a strategic transportation plan as stated in this action item. This action item should be corrected to reflect the proper plan title.

Page 15 – Policy CIR-19 – NVTA has a Transportation Demand Management (TDM) division and coordinates a number of traffic management efforts with its partners at Solano Transportation Authority. This should be noted in the document.

Page 16 - Policy CIR-22 – the policy should include parking charges which has been shown to significantly discourage single occupancy vehicle commuting.

Page 17 - Policy CIR-27 and Policy CIR 27.2 – the policies should note that NVTA is taking the lead in coordination with Caltrans on in-county highway projects funded with local STIP and other funding sources (i.e. other than SHOPP projects).

Page 17 & 18

Policy CIR-27-Include accommodation/improvements/reducing conflicts for bicycles and pedestrians at intersections (section only mentions improvements for vehicle traffic flow)

Page 19 Pedestrian and Bicycle

Policy CIR-29- Add Countywide Pedestrian Plan

Page 20

Policy CIR-36 : Complete Streets Standards? This section only mentions Highway Standards and traffic flow interference-Design standards should consider all modes where appropriate

Page 21 - Policy CIR-37 – Add “work with NVTA on technologies that could improve up valley traffic conditions on SR 29 Up Valley without widening the highway infrastructure”.

Page 23 - Policy CIR-42 – Add “work with NVTA and Sonoma Marin Area Rail Transit (SMART), Solano County Transportation Authority, Sonoma County Transportation Authority, and Transportation Authority of Marin to bring SMART to the Suisun AmTrak station to connect with the Capitol Corridor and create a multi-modal transportation hub in Napa near the airport.

Sincerely,



Kate Miller, Executive Director

Dear Dana Agers,

As a Napa resident, I am writing to object to the current traffic patterns. Whoever decided to change our downtown streets from one way to two way made a huge mistake. Traffic no longer flows through town and one cannot see around parked cars to safely enter the intersection.

The signals in Napa are not well timed - especially downtown. When the light goes green, you expect to drive ahead for a few blocks. Not so... you are stopping at each signal (red light) instead. It is frustrating!!

I can not believe Napa is considering building of Napa Pipe without a major overhaul of

the highways in and out of Napa.
Traffic gets worse everyday. Signals
on Highway 29, Jamison Canyon,
and the entry from Jamison to
Highway 80 need to be redesigned.
Traffic is terrible and getting
worse every year. Help!!!

Thank you for your consideration

Heidi Williams
1849 Seville Dr.
Napa, CA 94559
707 332-8735

From: atki@sonic.net
To: [Ayers, Dana](#)
Subject: Comments on Traffic Update
Date: Sunday, May 13, 2018 9:11:47 AM

Dana:

Please add these comments to your traffic study and also forward to the Planning Commission.

One good start to helping traffic on rural roadways in Napa County is to stop approving tasting rooms and so called event centers in rural Napa County. Allow wineries but eliminate all future applications that request an on-site tasting room. Wineries are all crying that they need a tasting room to connect with the end consumer or they will be out of business. Put future applicants on notice that if they want a tasting room, it will have to be in the commercially zoned areas of a city. If they know that going into their goal of developing a winery, they can decide whether or not to build a winery before they file for a permit. If they decide they cannot make it without that direct consumer interaction on an agriculturally zoned property, maybe that is an indication they need to do something different. What is stopping someone with an olive or walnut orchard from making the same claim that they cannot survive without having a "tasting room" to sample their products? Heaven help us when the cannabis growers start using the same argument.

Scott Atkinson
707.303.0010

Saving one dog will not change the world, but surely for that one dog, the world will change forever.

From: [Thomas Miele](#)
To: [Ayers, Dana](#)
Subject: Napa County Traffic/Road Studies
Date: Wednesday, May 09, 2018 9:52:13 PM

Dana - I was looking at an aerial view of Napa and Fairfield and noticed that Green Valley Road at the east end of Coombsville Road appears to have been a throughway to Fairfield's Green Valley Road. Has the idea of "reconnecting" these roads been studied? The distance between the two roads is less than 3-miles. See attached

Also, has the thought of using Ramal Road to Skaggs Island Road to Highway 37 been studied?

Thomas M. Miele



Andrews Ct

Napa County General Plan – Draft Circulation Element

5/2/18

Policy CIR-4 (page 12) affordable housing ...add something about encouraging housing near transportation hubs...

Policy CIR-8 & Action Item CIR-8.1 (page 13): **Caution...**We need to consider and acknowledge the dramatic increase in new technologies and the potential for driver-less vehicles, which will reduce the need for hard-scape parking areas and structures.

Policy CIR-22 (page 16): We should be encouraging all major employers in the County to demonstrate leadership in these areas where they can.

Policy CIR 34 (page 20): Could/should we include subsidies for commuters utilizing regional transit and connection to Lyft & other transportation network companies (TNC's)?

Policy CIR 36 (page 20): Should there be an action item for this policy to review the new development approvals and ensure roads are adequate for the demands placed upon them? (eg. Soda Canyon Road, Atlas Peak Road, etc.)

From: [Dalene Whitlock](#)
To: [Ayers, Dana](#)
Subject: Comments on the General Plan Circulation Element
Date: Monday, April 30, 2018 1:06:43 PM

Having prepared many traffic studies for projects in the County of Napa, we have encountered numerous situations where a left-turn lane is warranted based on the policy as contained in the County's Road and Street Standards, but would not be warranted using criterion applied by every other jurisdiction where we prepare analyses, including Caltrans. The current policy is based on the daily volumes on the roadways from which access is obtained and the driveway or minor street, with no reference to the direction of traffic on either facility. Many times, we have had a situation where all or nearly all the traffic entering a driveway is coming from the direction that results in a right turn into the driveway, but when this directionality is not taken into account, the turn lane is warranted despite the fact that it will rarely be used, resulting in excess pavement and negative environmental impacts without an associated traffic operation or safety benefit.

I urge the Board of Supervisors to direct staff to update this policy to be more consistent with industry standards, and specifically, to take the directionality of traffic into consideration.

Thank you.

Dalene Whitlock

Dalene J. Whitlock
PE, PTOE Principal



Office 707.542.9500 Mobile 707.486.5792
490 Mendocino Avenue, Suite 201 Santa Rosa, CA 95401
www.w-trans.com

From: [CTG](#)
To: [Ayers, Dana](#)
Subject: Comments on the Draft Traffic Impact Study Guidelines
Date: Friday, April 27, 2018 4:54:39 PM
Attachments: [Transportation Impact Study Guidelines.pdf](#)

Hi Dana:

I have reviewed both the Draft Circulation Element and the Draft Traffic Impact Study Guidelines and have attached a few comments on the second document. Having worked in the County for more than 40 years and having completed more than 80 winery or airport area studies for the County, I thought it would be helpful to ask some questions and provide some input to make the guidelines a little more user friendly and to make life easier for the traffic engineers needing to follow the guidelines and County staff needing to review the findings. My comments just pertain to the Traffic Study Guidelines.

Thank you.

Mark Crane, P.E./T.E.

Fellow Institute of Transportation Engineers

-- --

Mark Crane, P.E.
Crane Transportation Group
2621 E. Windrim Court
Elk Grove, CA 95758
916.647.3406 phone
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cranetransgroup@gmail.com

DRAFT TRANSPORTATION IMPACT STUDY GUIDELINES COUNTY OF NAPA

COMMENTS & QUESTIONS

1. The new direction in days and seasons to be analyzed for traffic studies is for Tuesday/Wednesday/Thursday evaluation for spring and fall conditions (excluding harvest). Does this mean that past direction from Public Works over the past 20+ years for winery reports to study Friday/Saturday conditions during harvest should now be eliminated? Midweek volumes in May will definitely be lower than Friday volumes in September.
2. Will there be a need to seasonally adjust traffic counts to reflect a particular spring/fall (non-harvest) month of the year so there will be consistency between traffic studies? If so, what month and what seasonal adjustment factors should be used (Caltrans PeMS historical counts for SR 29)? If seasonal adjustments are requested, one set of conversion factors should be developed for consistency.
3. Trip generation projections for winery project will need to depend upon County supplied traffic studies for similar projects. However, it will be very difficult to draw accurate comparisons given the differences in visitation requests and production levels of the different wineries. A lot of data interpretation will be needed which will use time and budget.
4. Procedures for determining trip generation for winery projects sound good for a university class, but there is a reality of the time and cost for the proposed determination process. Cost of traffic studies will go up significantly with these new procedures. What is the difference in using an applicant's best estimate of numbers and schedules and visitation numbers versus trying to compare a new project versus a shotgun survey of other winery projects that may or may not be applicable?
5. Providing input for all listed traffic study work tasks will significantly increase the cost of doing traffic studies. Will the County traffic engineer provide a checklist of the items required for each project so as to eliminate the production of a lot of unneeded data?
6. Why is the middle of a weekend afternoon not listed as a critical analysis period (1:00-4:00 PM)? This is the period of peak winery visitation and peak ambient volumes in a lot of locations. The weekend study times listed are not always critical – in particular, the noon hours rarely have peak ambient traffic or peak winery visitation.
7. The County needs to specify which of the NVTAs traffic model runs should be used for evaluation purposes. This will provide consistency between studies. If the model runs to be used change, the County needs to inform the traffic engineers regularly doing projects in the County of these changes.

8. Access to NVTAs traffic model calibration run and future projections for use in County traffic studies should be free. Direction needs to be provided by the County whether model future projections should be used as presented, or whether the difference method using the calibration and future runs should be used.
9. Are County or Caltrans analysis procedures and significance criteria to be used for state highway evaluation? If they are now different, why don't the County and Caltrans confer now and agree on one uniform set of criteria? Caltrans will usually go along with what the local jurisdiction wants. This needs to be done ASAP.
10. Are the County left turn warrant criteria to be applied along state highways?
11. How many years of collision data need to be reviewed? Is this needed for every study?
12. Ninety-nine percent of all County intersections to be evaluated are unsignalized. Yet, there is very little direction or mention of their operation in the guidelines (only in the Fehr & Peers significance criteria memo attached).
13. What are LOS minimum acceptable standards for collector roads
14. Is the 2010 HCM preferred for LOS evaluation rather than the Version 6 from 2017?
15. Please define locally valid travel demand models (page 25) and give examples.
16. Intersection traffic control – for unsignalized intersections – No guidance is provided if an intersection already meets signal warrant criteria.
17. Which signal warrant criteria are to be used? Peak hour volume/peak hour delay/both?
18. Some potential mitigation measures are missing for unsignalized intersections operating unacceptably (such as adding an additional lane on the stop sign controlled approach or providing a median refuge area for left turns from a side street).
19. Are ADT counts and projections needed for every study and for every analysis scenario? How are ADT volumes to be evaluated?
20. The **County Trip Generation Worksheet** has serious problems – in particular the daily to peak hour conversion percentages don't make any sense (especially the one for Saturday that shows 57 percent of all daily traffic happening in one hour between 3:00 and 4:00 PM). No winery would schedule 57 percent of guests in one hour, nor do they get 57 percent of visitation in one hour. Also, for a weekday with 38 percent of daily traffic happening in one hour is not realistic. Finally, Caltrans historical counts on SR 29 don't back up peaking factors on the form. The entire form needs a common sense review and major update.

21. **April 20, 2018 memo by Fehr & Peers re Guidelines for Application of Updated General Plan Circulation Polices on Significance Criteria Related to Vehicle LOS** is a good start. Recommendations to improve are:

- Provide more input/examples for side street stop sign controlled intersections.
- Be clear whether signal warrant evaluation is or is not to be considered a separate significant impact evaluation. If yes, set forth the Existing, Near Term horizon and Cumulative criteria for locations already exceeding warrant criteria. This would pertain to virtually every major unsignalized intersection along SR 29 and Silverado Trail south of St. Helena.
- Make it clear that Existing + Project and Near Term + Project evaluation are by the same criteria and that cumulative criteria only apply to General Plan buildout projections.
- Specify which signal warrant criteria are to be used – peak hour?
- Unsignalized intersection evaluation needs more clarity – are LOS results for side street stop sign controlled intersections just for the entire intersection, or just for the stop sign controlled approach?
- If LOS E or F is acceptable (per the General Plan EIR) along segments of SR 29, SR 12-121, and segments of Silverado Trail, does this also mean that all intersections within these segments are allowed to operate at these same LOS E or F standards? If so, for those segments with allowable LOS F operation, how can there be any significant impacts?

22. **General Comment.** The purpose of traffic evaluations that consider both Existing and General Plan horizon conditions has wandered off a commonsense path over the years. Full operations analysis of Existing and Near Term horizon projections (with and without the project) is totally appropriate as there is good certainty of the traffic volumes being evaluated. However, for the General Plan horizon (2040), a planning level analysis makes much more sense given the speculative nature of projections from any traffic model. Model results depend upon accurate calibration (which are considered acceptable if they are within 5 to 20 percent +/- of the real world volumes – depending upon the type of road), reliable land use projections for Napa and adjacent counties (which did not happen in the last General Plan model) and knowledge of the local circulation system and traffic flows (which was not apparent with the results form the last General Plan model). Projections for Napa County also need to take into account capacity controlling locations on roadways providing access from adjacent counties – which they won't.

Given that 2040 traffic growth projections from any model will probably be +/- 10 to 20 percent high or low, a planning level rather than detailed operations analysis is most appropriate. The suggestion that different potential methods to determine future traffic should be utilized depending upon the project and location will create an academic exercise, but to what end?

Pick one methodology, use it everywhere (for simplicity of use by the traffic engineers conducting the studies and evaluation by County staff) and use a planning level evaluation (such as the one in the last General Plan for roadway operation by the Florida Department of Highways – who is light years ahead of Caltrans in evaluation of circulation systems – my opinion).

Thank you for considering my input.