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May 21, 2010

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NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

Mr. Kristen E. Pigman, President
The Pigman Companies, LLC
2481 Sunrise Boulevard, Suite 200
Gold River, CA 95670

Subject: Responses to Comments by Tom Brohard and Associates Related to the Napa Commerce Center Traffic Impact Analysis (TIA)

Dear Mr. Pigman:

This letter has been prepared in response to a comment letter submitted by Tom Brohard and Associates related to our Napa Commerce Center TIA. Our responses address the various technical issues raised by Mr. Brohard. Because a number of Mr. Brohard's comments reflect his being unaware of other traffic data, we have also provided updated information that confirms the validity of our TIA.

Although Mr. Brohard raised a number of comments, they essentially involve the following five (5) issues:

1. Validity of the baseline analysis scenario
2. On-site queuing impacts at project driveways
3. Need for a cumulative analysis
4. Adequacy of mitigation measures
5. Consistency with the Napa Pipe Project

1. Validity of the Baseline Analysis Scenario:

The baseline scenario was established through consultations with Mr. Rick Marshall, the Deputy Director of Public Works for Napa County. This scenario reflects the buildout of the adjacent Greenwood Business Park; the proposed Napa Commerce Center trips were then added to identify the short term traffic impacts. Due to the size of these developments (378,891 sq.ft. in the approved Greenwood Business Park and 490,503 sq.ft. in the proposed Napa Commerce Center project), the traffic generated by these combined developments would represent a very conservative estimate of traffic growth over the next 2-3 years. Our TIA short term baseline scenario is conservative and valid.

With regard to other "Annual Ambient Growth", we assume Mr. Brohard is referring to potential background traffic increases on State Route 29 (SR 29) and SR 12 in the project area. However, Caltrans traffic volume records indicate that volumes on SR 29 and SR 12 have been constant or have actually decreased slightly over the 2006-2009 (the most recent 3 year period for which Caltrans has volume data). There is no evidence that our short term baseline analysis should have included increased traffic volumes on SR 29 or SR 12 – our TIA analysis is appropriate.

With regard to impacts at SR 29/SR 12-Airport Boulevard, our TIA found that when project trips are added to the baseline conditions, this intersection would continue to operate at an acceptable LOS "D". Cumulative buildout mitigation measures are being established (and the appropriate traffic impact fee identified) as a part of the "Update of Airport Industrial Area Traffic Mitigation Fee Program" (see section 3 of this letter).

2. On-Site Queuing Impacts at Project Driveways:

Our TIA provided Level of Service (LOS) and operations calculations for each of the four project driveways (three on Devlin Road and one on Airport Boulevard). As outlined in our report (Table 5, page 13, all of the driveways outbound traffic would operate at LOS "C" or better. This would be considered very acceptable urban peak hour conditions.

With regard to queuing, our TIA also provided 95th percentile vehicle queue calculations for each driveway (Table 6, page 18 of the TIA). The following compares the queue lengths with the distance between the adjacent roadway travel lane and the internal parking aisle:

- Devlin Road north driveway; 50 foot queue/55 foot distance
- Devlin Road center driveway; 65 foot queue/60 foot distance
- Devlin Road south driveway; 49 foot queue/70 foot distance
- Airport Boulevard driveway; 62 foot queue/65 foot distance

As this comparison indicates, at three of the project driveways, the calculated 95th percentile queue for vehicles exiting the project would not back up beyond the nearest internal parking aisle. Even at the project's Devlin Road center driveway, the calculated queue would be approximately equal to the available distance between the travel lane and the internal parking aisle. There is no evidence that the driveway queuing would significantly impact internal circulation. Similarly, based on the traffic circulation analysis, there is no reason to conclude that the driveways' operation would impact traffic flows on the adjacent streets.

3. Need for a Cumulative Analysis:

As noted above, the scope of our TIA was established through consultations with Mr. Rick Marshall, the Deputy Director of Public Works for Napa County. Consistent with County traffic analysis direction, our TIA relied on the cumulative buildout traffic findings included in the County's cumulative analysis - the "Update of Airport Industrial Area Traffic Mitigation Fee Program".

The Airport Industrial Area is subject to a County traffic mitigation fee program for the purpose of constructing long term traffic mitigation within and adjacent to the area. That fee is currently \$3,551 per PM peak hour trip. The current update has involved a cumulative traffic analysis including complete buildout of the Airport Industrial Area, cumulative development outside of the Area and long term traffic growth on the nearby State highways.

The proposed Napa Commerce Center project was included in the cumulative analysis conducted as a part of the Update of Airport Industrial Area Traffic Mitigation Fee Program. Thus, a cumulative traffic analysis is available relative to the proposed Napa Commerce Center.

4. Adequacy of Mitigation Measures:

The TIA for the Napa Commerce Center project concluded that traffic impacts at the Airport Boulevard/Devlin Road intersection would require mitigation. The TIA identifies specific mitigation measures to address the impacts resulting from the proposed project (and the cumulative baseline traffic generated by the Greenwood Business Park). These measures include the widening of Airport Boulevard and Devlin Road to accommodate dual westbound left turn lanes. These measures would address queuing impacts that would be reduced to "less than significant" levels.



The TIA also identifies intersection queuing problems at SR 29/Soscol Ferry and SR 29/Airport-SR 12 that would be exacerbated by the proposed Napa Commerce Center project. However, as noted in the TIA, these problems currently exist and are related to the overall operation of the intersections. The Napa County cumulative analysis conducted as a part of the Update of Airport Industrial Area Traffic Mitigation Fee Program applies to the Napa Commerce Center project and addresses the future improvements on these regional facilities. The proposed Napa Commerce Center project would participate in the implementation of these cumulative mitigation measures through the adopted fee program. The current traffic mitigation fee of \$3,551 per PM peak hour trip would yield a total of \$1,498,522 – this fee would be applied toward the project’s “fair share” of the longer term mitigation measures on these regional facilities.

5. Consistency with the Napa Pipe Project:

The Napa Pipe Project would be a large mixed use development north of the Airport Industrial Area. The project application is being considered by Napa County, and appropriate environmental documents (including traffic studies) have been completed.

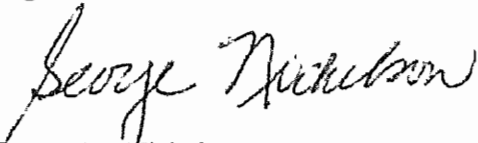
This project has been included in the cumulative analysis conducted as a part of the Update of Airport Industrial Area Traffic Mitigation Fee Program. Thus, there will ultimately be a consistent set of mitigation measures that address impacts associated with the Airport Industrial Area and other cumulative development.

In summary, the TIA for the Napa Commerce Center was prepared based on consultations with Mr. Rick Marshall, the Deputy Director of Public Works for Napa County. The analysis included recommended mitigation measures to address short term base plus project impacts. With regard to cumulative traffic conditions, the proposed project would participate in the Airport Industrial Area Traffic Mitigation Fee Program, a program designed to allow specific development projects to pay their “fair share” toward cumulative mitigation measures. With the project specific mitigation and participation in the Airport Industrial Area Traffic Mitigation Fee Program, there would be no residual significant traffic impacts associated with the project.

I trust that this letter responds to your needs and those of Napa County. Please let me know if further input is required.

Sincerely,

OMNI-MEANS, Ltd.
Engineers & Planners

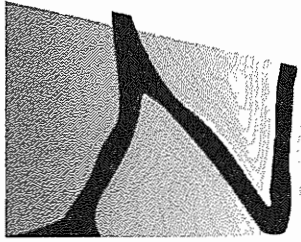


George W. Nickelson, P.E.
Branch Manager

Cc: Brad Shirhall; Alicia Guerra,

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NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

May 21, 2010

Mr. Chris Cahill
Napa County
Conservation, Development & Planning Department
1195 Third Street, Suite 210
Napa, CA 94559

**Subject: Response to the May 17, 2010 Living Rivers Council Letter
For the Napa 34 Holdings Project
Napa County, California**

Dear Mr. Cahill:

This letter addresses the points made in a comment letter from the Living Rivers Council to you in response to the Napa 34 Holdings project. Issues raised in their letter, dated May 17, 2010 are addressed in this response letter.

The wetlands had been substantially degraded by cattle owned by previous owners. The wetlands should be restored and re-vegetated to improve the habitat for animals associated with that ecological niche.

Much of the Napa region was historically grazed by cattle farmers. Cattle are hard on a landscape but at the same time, reduce thatch buildup. Removing cattle from a property allows the property to return to a more natural state. It is widely accepted that removing an ecological pressure, such as cattle, is beneficial to land. The removal of the cattle from the Napa 34 property and allowing it to be fallow has resulted in an ecological gain over the past several years. As the project is being built, the wetland corridor will be restored and revegetated to improve the habitat for indigenous animals and their ecological niche. The wetland area will be made larger and be planted with herbaceous and woody native hydrophytic vegetation as explained in the Napa 34 Project Initial Study/Mitigated Negative Declaration (IS/MND). Consequently, the comment does not result in the identification of any new significant impacts warranting further environmental review.

A barrier should be erected to prevent terrestrial wetland animals from attempting to cross high speed traffic on the highway and redirected to the stream culvert under the highway. A wildlife corridor setback should be established to parallel the adjacent stream channel to provide a wildlife corridor

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The area will be fenced and protected from incidental human foot traffic moving into the wetland corridor as explained in the (IS/MND). Because the wetland preserve corridor is an open system, allowing for wildlife to move freely in and out of the area there will be no attempt to corral and contain wildlife in the corridor. It is important to allow movement into and out of the area for the benefit of wildlife. The culverts will allow for wildlife movement. A wetland buffer setback is proposed along the entire wetland corridor as described in the IS/MND. No further analysis is warranted.

Roadway and parking lot runoff should be filtered and an oil entrapment system installed to prevent contaminants from polluting the wetland and the adjacent stream.

An elaborate system of Best Management Practices will be established to filter development and road runoff before it enters the wetland swale corridor as described in the IS/MND and the applicable conditions of approval.

Landscaping should utilize native plant species to restore some of the original vegetation at the site. Chemical spraying should be prohibited to avoid contaminated runoff into the wetland area.

Native plants will be established along and within the wetland swale corridor. Non native species will be replaced where feasible. Native species only will be planted in the wetland corridor. Chemical spraying will be prohibited within the wetland preserve corridor. Consequently, further environmental review is not required.

If you would like to discuss further, please call me at (530) 887-8500.

Sincerely,



Jeff Glazner
Principal Biologist
Professional Wetland Scientist #961