



A Tradition of Stewardship  
A Commitment to Service

David Morrison  
Director

**MEMORANDUM**

To: Planning Commission	From: Charlene Gallina, Supervising Planner
Date: January 15, 2020	Re: Scarlett Winery #P16-00428 Supplemental Analysis Assessor Parcel #030-280-010

The Planning Commission Staff Report prepared for the Scarlett Winery project identified that on January 6, 2020 staff had received late correspondence from Shute, Mihaly & Weinberger, LLP regarding additional traffic and road issues (Attachment G) and would be sending out before the meeting a memorandum completing staff’s assessment of these issues. Provided below is staff’s assessment of these issues.

**TRAFFIC:**

The SMW October Letter alleges that the MND fails to adequately analyze traffic impacts and in particular:

- 1) The Mitigated Negative Declaration (MND) contains no evaluation of the project’s impacts on vehicle miles travelled (“VMT”) or how that VMT relates to relevant policies in the County’s Circulation Element.

**Staff Response:**

The transition to VMT is not required of lead agencies until July 1, 2020. However, in anticipation of the transition, the Circulation Element includes new policies that reflect this new regulatory framework for transportation impact assessment, along with a draft threshold of significance that is based on reduction of VMT compared to the unmitigated project rather than the regional average VMT (Policies CIR-7 through CIR-9). Staff believes this alternative approach to determining the significance of a project's transportation impacts would be better suited to Napa County's rural context, while still supporting the efforts of the County to achieve the greenhouse gas emissions (GHG) goals of its pending Climate Action Plan. The reduction in VMT and, correspondingly, GHG emissions from the transportation sector, is also necessary for Napa County, the region, and the state to achieve long-term, statewide mandates targeted toward reducing GHG emissions. Such mandates include, but are not limited to Executive Orders S-3-05 and B-16-12, which respectively, set a general statewide GHG emissions reduction target of 80 percent below 1990 levels by 2050, and an 80 percent GHG emissions reduction below 1990 levels (also by 2050) specifically for the transportation sector.

The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). At this time, the County does not have a formal implementation program regarding VMT reduction in place.

However, staff in preparation of the staff report for October 2, 2019, had discussions with the Applicant's representative regarding the use of shuttle service during marketing events for those events over 100 people. In addition, the applicant has now offered use of shuttle service for events for 75 persons or larger. The Applicant envisions using smaller HOV buses for some of the service and larger shuttle buses for larger events. In some cases, shuttle service may operate from different venues at various times, based on the type and size of the event, as well as, where visitors will originate from. Furthermore, staff, as with other projects recently, added a project specific condition of approval (COA#4.20(b) which requires the applicant to submit a Traffic Demand Management Plan to the Planning Division and Public Works for review and approval. The purpose of this condition is to demonstrate how the winery's efforts will reduce vehicle miles traveled and begin to address this issue until a formal program is adopted. The winery's efforts to reduce vehicle miles traveled (VMT) would include but not be limited to the following: during the reservation process, guests and larger groups are encouraged to carpool and information on group transportation options are provided; staff is encouraged to bring lunch, space is provided to eat onsite, and occasionally the winery provides meals for employees. It is also noted that approximately 30,912 gallons of the wine is able to be produced from the vineyards on-site and on nearby property with vineyards owned by the Applicant, limiting trips associated with grape on-haul. As stated in the condition, the Applicant will also be required to maintain monitoring records for submittal of annual reporting upon request in response to the County's development of a VMT Reduction Program.

- 2) The MND's analysis of trip generation is inconsistent with peak-hour trip generation values shown on the County's "Winery Traffic Information/Trip Generation Sheet. In addition, the trip generation figures used by the MND differ from those shown on the County's website or from the ones in the MND's Traffic appendix. (GCTC Report, page 2.) Corrected trip generation data, as shown in the GCTC Report (page 2, 3) demonstrates that the project's trip generation, and therefore its traffic impacts, is understated in the MND. Moreover, the MND's traffic study completely omits analysis of trip generation during the largest proposed marketing event. (GCTC Report, page 3.)

Staff Response:

The Applicant's Traffic Consultant provided a response to trip generation issues (See Attachment "E" Memorandums from the Project Consultant and Crane Transportation Group (CTG) Memorandum dated November 15, 2019 and as attached herein - Crane Transportation Memorandum dated January 9, 2020). CTG indicated that trip generation methodology utilized in their traffic report was acceptable to the former County Traffic Engineer at the time of report preparation. The SMW comment references preferred trip rates from the "Winery Traffic Information/Trip Generation Sheet" which showed an assumption that 38% of all daily weekday traffic at a winery occurs during one hour of the afternoon, and that 57% of all daily Saturday traffic at a winery occurs during one hour an afternoon. Since traffic counts on winery driveways have shown that, at most, 15% to 20% of a winery's traffic occurs during a given hour on a weekday or Saturday afternoon, it was determined through consultation with the former County Traffic Engineer that the Winery Trip Generation sheet was not realistic in this matter and that the Trip Generation Methodology used by CTG in the traffic study was acceptable and more appropriate.

It should be further noted during the course of planning and various iterations of a project as it evolves, traffic generation numbers change. In some instances, the numbers change in an effort to reduce potential impacts or to avoid triggering thresholds for things like left-turn lane or other traffic requirements, ground water requirements, or simply to reflect a rethinking of the Applicant's marketing plans relative to days of the week or hours of the day. But the traffic study itself is predicated on the traffic generation numbers submitted as

part of the use permit application. CTG evaluated this project as directed by the former County Traffic Engineer, and this report was used for the County's CEQA document. The report found that there was no potentially significant impact related to traffic generation.

- 3) Even though the Project will add new traffic to already-impacted intersections (e.g., the Skellenger Lane approach to Silverado Trail), the MND fails to consider the extent and severity of Project-related traffic on worsened conditions at area intersections. The MND uses a threshold of significance criterion requiring that the incremental project traffic be equal to 10 percent or more for impacted intersections and employs an arbitrary one percent (1%) cumulative impact threshold, claiming that there will not be a significant cumulative impact because the Project will increase existing peak traffic volumes by less than this amount. These thresholds are arbitrary.

Staff Response:

Since 2015, the County has relied on a memorandum prepared by the traffic engineering firm of Fehr & Peers that interprets the General Plan significance criteria and associated significance thresholds for arterials, signalized intersections, and unsignalized intersections for project conditions and for cumulative conditions. The County has consistently and uniformly applied this interpretation on discretionary projects for purposes of evaluating traffic impacts.

In 2016 with submittal of the Use Permit application, the intersections evaluated in the CTG traffic study were selected by County staff upon submittal of the project application potential areas of concern that needed to be evaluated in conjunction with this project. The 10% or greater significance criteria limit for the traffic added by a project on a stop sign controlled intersection approach was the County significance criteria at the time of report preparation, as was the 1% or greater traffic added significance criteria for project traffic being added to arterial roadways.

- 4) The MND fails to accurately evaluate the geographic distribution of those trips on area roadways. (GCTC Report at 3.) The MND assumes that the majority of project-related trips would travel to or from the south on Silverado Trail. However, as explained in the GCTC Report, this assumption is incorrect: in reality only 30 to 36 percent of trips generated in the area approach from the south. Existing travel patterns suggest that a substantial proportion of traffic exiting the project site would travel north on Silverado Trail, necessitating a left turn from Skellenger Lane onto Silverado Trail. This increase in eastbound left turns would result in increased traffic delays, which has not been analyzed in the MND.

Staff Response:

The Applicant's Traffic Consultant provided a response to traffic issues (See Memorandum from the Project Consultant Crane Transportation Group Memorandum dated January 9, 2020). Project traffic distribution was based upon current traffic patterns at the Skellenger Lane intersections with Ponti Road and Silverado Trail. During the peak traffic hours on a Friday or Saturday afternoon the vast majority of project traffic would be expected to turn right from Skellenger Lane to go southbound on Silverado Trail. Existing turn movement counts at the Silverado Trail/Skellenger intersection showed that during a Friday PM peak hour the Skellenger intersection approach had two (2) left turns to the north and 159 right turns to the south, while during Saturday PM peak hour the Skellenger intersection approach had three (3) left turns to the north and 158 right turns to the south. Therefore, the contention from the SMW comment letter that most exiting project traffic

should be turning left from Skellinger Lane to go north on Silverado Trail is not considered realistic by the CTG.

**PONTI ROAD:**

In addition to the Public Work's Department assessment of Ponti Road provided in the Staff Report, it is the Napa County Fire Marshal's Office stance that the flat paved, average 15' width, as well as direct line of sight in the entirety of Ponti Road is adequate for Fire Department vehicles. Furthermore, the road has privately owned shoulders throughout in excess of 20' which can be utilized by egressing vehicles in an emergency.

With this assessment, the Applicant has indicated that they are willing to propose a measure intended to enhance the safety of Ponti Road, in the form of two turn-out areas on the east side of Ponti Road, coinciding with their ownership on the adjacent property. These turnouts would be hard-pack earth with gravel, subject to County Fire requirements where turnouts are to be provided. Given the short segment of the road and the excellent sight distance in either direction, the Applicant has indicated that these two turnouts should provide more than adequately for the times that large vehicles pass on the paved road and a vehicle might wish to pull off the existing road width.

**Attachments:**

Crane Transportation Group Memorandum, dated January 9, 2020

Donna Oldford, Plans4Wine Email, dated January 13, 2020

Napa County Fire Marshal's Office Memorandum, dated January 14, 2020

# CRANE TRANSPORTATION GROUP

*Central Valley Office*  
2621 East Windrim Court  
Elk Grove, CA 95758  
(916) 647-3406 Phone  
(916) 647-3408 Fax

*San Francisco Bay Area Office*  
6220 Bay View Avenue  
San Pablo, CA 94806  
(510) 236-9375 Phone  
(510) 236-1091 Fax

---

## MEMORANDUM

**TO:** Donna Oldford <[dboldford@aol.com](mailto:dboldford@aol.com)>

**FROM:** Mark Crane, P.E. ([cranetransgroup@gmail.com](mailto:cranetransgroup@gmail.com))

**DATE:** January 9, 2020

**RE:** **RESPONSES TO OCTOBER 2, 2019 SMW LETTER RE COMMENTS ON THE SCARLETT WINERY TRAFFIC STUDY BY CRANE TRANSPORTATION GROUP (CTG)**

---

**Response 1.** VMT Analysis was not required in the Scope of Services approved by the County more than a year ago. Also, the County still has no VMT significance criteria for winery projects.

**Response 2.** Trip generation methodology utilized in the CTG traffic report was acceptable to the County Traffic Engineer at the time of report preparation. The SMW comment references preferred trip rates from the “Winery Traffic Information/Trip Generation Sheet” which showed an assumption that 38% of all daily weekday traffic at a winery occurs during one hour of the afternoon, and that 57% of all daily Saturday traffic at a winery occurs during one hour an afternoon. Since traffic counts on winery driveways have shown that, at most, 15% to 20% of a winery’s traffic occurs during a given hour on a weekday or Saturday afternoon, it was determined through consultation with the County Traffic Engineer that the Winery Trip Generation sheet was not at all realistic in this matter and that the Trip Generation Methodology used by CTG in the traffic study was acceptable.

It should also be noted that the County formed a traffic committee almost a year ago to evaluate the 38% and 57% peak hour values applied to total daily traffic and found these percentages not to be accurate.

**Response 3.** The intersections evaluated in the CTG traffic study were selected by County staff. The 10% or greater significance criteria limit for the traffic added by a project on a stop sign controlled intersection approach was the County significance criteria at the time of report preparation, as was the 1% or greater traffic added significance criteria for project traffic being added to arterial roadways.

**Response 4.** Project traffic distribution was based upon current traffic patterns at the Skellinger Lane intersections with Pointe Road and Silverado Trail. During the peak traffic hours on a Friday or Saturday afternoon the vast majority of project traffic would be expected to turn right from Skellinger Lane to go southbound on Silverado Trail. Existing turn movement counts at the Silverado Trail/Skellinger intersection showed that during a Friday PM peak hour the Skellinger intersection approach had 2 left turns to the north and 159 right turns to the south, while during Saturday PM peak hour the Skellinger intersection approach had 3 left turns to the north and 158 right turns to the south.

Therefore, the contention from the SMW comment letter that most exiting project traffic should be turning left from Skellinger Lane to go north on Silverado Trail is not considered realistic.

Thank you,

Mark Crane, P.E.

**From:** [Donna Oldford](#)  
**To:** [Gallina, Charlene](#); [Anderson, Laura](#); [mcooper@scarlettwines.com](mailto:mcooper@scarlettwines.com); [bmcmahon@perkinscoie.com](mailto:bmcmahon@perkinscoie.com); [paulb@barteltengineering.com](mailto:paulb@barteltengineering.com)  
**Subject:** Turnouts on Ponti Road - Scarlett Winery Use Permit  
**Date:** Monday, January 13, 2020 9:13:49 PM

---

Charlene and Laura,

As you are aware, Ponti Road is a County road and the County Public Works Department has accepted it at the existing width to provide access to the proposed Scarlett Winery. There are a number of instances where approved wineries are accessed by County roads that are not necessarily consistent with the specifications contained in the *Napa County Street and Road Standards*. In this instance, the road is completely level and sight distance is excellent. There is hard-packed earth on either side of the existing road. Public Works has confirmed that they believe this road is safe and CDF has accepted the road as safe for emergency fire protection access.

The applicant wishes to propose a measure intended to enhance the safety of Ponti Road, in the form of two turn-out areas on the east side of Ponti Road, coinciding with their ownership on the adjacent property. These turnouts will be hard-pack earth with gravel, as is typical acceptance by the County in cases where turnouts are provided. Given the short segment of the road and the excellent sight distance in either direction, these two turnouts should provide more than adequately for the times that large vehicles pass on the paved road and a vehicle might wish to pull off the existing road width.

Please accept this offer as a voluntary condition of approval for the project, offered by the applicant. Thank you.

Best,  
Donna Oldford  
Plans4Wine



A Tradition of Stewardship  
A Commitment to Service

**Napa County Fire Department  
Fire Marshal's Office**  
1125 3<sup>rd</sup> Street  
Napa, CA 94558

Office: (707) 299-1464  
Direct: (707) 299-1461

James Bales  
Fire Marshal  
**CAL FIRE**/Battalion Chief

---

**TO:** Planning Commission

**FROM:** Napa County Fire Marshal's Office

**DATE:** January 14, 2020

**SUBJECT:** P16-00428 Scarlett Winery 030-280-010

Napa County Fire Marshal's Office is addressing the subject comments from multiple property owners along Ponti Road in regards to the size and condition of an existing publicly maintained road.

It is the Fire Departments stance that the flat, paved, average 15' width, as well as direct line of sight in the entirety of Ponti Road is adequate for fire department vehicles. The road has privately owned shoulders throughout in excess of 20' which can be utilized by egressing vehicles in an emergency. The applicant of Scarlett Winery has also proposed to voluntarily install two county compliant turnouts on the east side of Ponti Road to assist with access and egress of vehicles.

James Bales  
Napa County Fire Marshal  
Battalion Chief  
Napa County Fire/CAL FIRE