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GIRARD WINERY USE PERMIT APPLICATION UP P14-00053

TRAFFIC RELATED GUIDING COUNTY POLICIES:

These policies have been fully vetted at public hearings. The residents of Napa Valley rely on their elected officials to uphold them as they are important cornerstones to their quality of life and welfare.

A. General Plan Policy CIR 116:

"The County will seek to maintain arterial Level of Service D or better on all County roadways".

B. ORDINANCE CHAPTER 18.04.010 - FINDINGS:

"F. Further, this board deems it necessary, for the purpose of promoting the health, safety and general welfare of the county, to revise the existing zoning ordinance...in accordance with the general plan and the following objectives:

- 1. To lessen congestion on roads and highways; (emphasis added)*
- 4. To promote health, safety and general welfare".*

CEQA - TRANSPORTATION/TRAFFIC FINDINGS:

"This analysis indicates that the added volume is so small as to result in no discernible change to the operation of State Hwy 29 from what would occur without the project".

"This project adds 2 peak hour trips south of Dunaweal to the State Hwy 29 volumes of 194 PM trips and 396 weekend trips, and 2:00PM and 1:00PM weekend trips, respectively, added to the 262 and 612 existing trips north of Dunaweal".

The Supplemental Report dated 4/9/15 states that: "The total volume of traffic on Dunaweal ranged from 1,484 vehicles on Thursday, to 1,691 on Saturday. With all approaches at LOS A or

B, the current operation of both intersections would be considered acceptable". Unclear language: Is the existing volume on Dunaweal Lane 262 to 612 or 1,484 to 1,691?

The traffic consultant concluded that: "Upon adding project-generated trips to existing volume, both the Dunaweal Lane/State Hwy 29 and Dunaweal Lane/Silverado Trail intersections are expected to continue operating at LOS A or B overall, as well as, on all approaches".

Were the impacts the approx. 3,000 Vehicle Daily Trips generated by the future entitled Silver Rose and Calistoga Hills resorts factored in?

The April 9, 2015 supplement to the W-Trans Traffic Impact Study analysis determined the project's potential impact on the operation of State Hwy 29 under the projected future 2030 PM peak hour volumes. It states that: "Both with maximum estimated project volumes added to anticipated 2030 volumes and without, operation would remain at **LOS E** both north and south of Dunaweal Lane. Based upon the projected 2030 volumes, the two intersections are expected to operate acceptably well, though the northbound Dunaweal lane approach to Silverado Trail is expected to operate at **LOS E** and the southbound Dunaweal Lane approach to State Hwy 29 is expected to operate at **LOS F** at peak hour".

These projections are contrary to stated County Policies and commitments to its residents. LOS E-F operations even at peak-hours. especially at the time when 40,000 of them drive to and from work.

Peak hour traffic inconvenience is not off limits to the residents' welfare nor is the projection to 2030 an excuse to delay appropriate action.

JUSTIFYING ARGUMENTS BY COUNTY OFFICIALS:

When approving traffic increasing projects, several County officials keep making the argument that: "*Traffic increases no matter what we do*".

This argument is not factual and is misleading the public:

A. According to the findings of the 2014 Fehr & Peers Travel behavior Study, only 9% of overall traffic is pass-through traffic accounting for 8,160 daily vehicle trips (9% of 181,330 entry-exits : 2 = 8,160). This is less that just the Copola or Beringer wineries generate.

The reality is that the Napa valley has the luxury of controlling its own traffic destiny almost as if it were an island. Practically all traffic, including future growth within Napa county is controlled and generated by the policies of this Commission, the Board of Supervisors and the Councils of its five cities.

B. It is the County's visitor expansion policies including but not limited to the facilitation of ever increasing numbers of attractions, number of wineries, their ever expanding uses, events, the funding of the Visitor's Bureau, in part towards this goal, which have resulted in:

Traffic growth in Napa county has grown by a whopping of 6% annually while the county population has grown by only 1.3% since 1982.

The reality is that 91% of all traffic and its growth is completely within local control.

CEQA - TRANSPORTATION DEMAND PROGRAM

The County CEQA Transportation/Traffic analyses have been employing two disingenuous tools in assessing that individual traffic impacts of projects are "less than significant".

1. The theory that scheduling winery visitations during off-peak hour traffic has less than significant impacts is no longer valid. Southbound traffic at Hwy 29 and the Silverado Trail is already at unsustainable **LOS E-F** beginning at 2:00 PM and northbound traffic does not ease before 11:00 AM. Given current intolerable traffic conditions at the two main Napa valley arteries throughout most of the day, the Transportation Demand Program has lost all credibility as an effective tool to ease traffic.

2. The practice of assessing traffic impacts of any given project by looking at a limited radius of influence, ignores serious and quantifiable impacts to the general traffic patterns in the Napa valley and circumvents the real intent of CEQA Mandatory Findings of Cumulative Impacts.

Any one doubting how destructive this practice has been over the years, need only drive a car from Calistoga to Vallejo from 6:00 AM to 11:00 AM or from 2:00 PM to 6:00 PM in the reverse direction.

The prevailing culture of finding marginal ways to circumvent rather than adhere to the intent of CEQA in approving projects, results in dishonoring the County's commitment to its residents to uphold the General Plan and related Ordinance thus degrading their welfare and quality of life.

CEQA - GREENHOUSE GAS EMISSIONS:

The unsustainable rates of traffic increases and the increased bumper to bumper traffic is also resulting in traffic delays with the associated increase in greenhouse gas emissions, let alone waste of energy.

It should serve as a reminder that entire three weeks of January 2015 were Save the Air days in the Bay Area. While this is not solely attributable to County traffic growth policies, it is a reminder that we all bare responsibility in reducing rather than increasing carbon emissions.

CONCLUSIONS:

Through both its General Plan and Ordinances, the County has recognized that reducing traffic congestion is a growing problem and it has made a commitment to its citizens to adhere to policies which honor this commitment.

Yet for many years and continuing, its conscious policies are undermining the results. Both the Traffic Element of the Napa County EIR and the Fehr & Peers Traffic Study are available with solid facts which allow no cover whatsoever to justify them.

Unless projects which promote growth are shown to lessen congestion, such projects should either be denied or both the General Plan and its related Ordinances should be amended accordingly. The County alternative employed by its current culture is making a mockery of the process.

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