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September 14, 2020

Via Email david.morrison@countyofnapa.org, charlene.gallina@countyofnapa.org

Napa County Planning Commission
David Morrison, Director of Planning
Charlene Gallina, Supervising Planner
County Administration Building
1195 Third Street, 2nd Floor
Napa, CA 94559

Re: September 16, 2020 Agenda, Item 7B: Benjamin Ranch Winery Use Permit
P13-00371-UP

Honorable Commissioners:

On behalf of Michael Honig, we submit these comments on the mitigated negative declaration (MND) prepared for the Benjamin Ranch Winery Project. The Project would permit production of 475,000 gallons of wine annually within a 79,623 square foot production facility. It would also include construction of 7,669 square foot visitors' center, which would include a commercial kitchen and a number of rooms for winery tours, tastings and marketing events. This Project allow for significantly larger daily events and numerous wine marketing events. The 400 onsite visitors allowed daily for wine tours and tasting is nearly **four times** the number of visitors at other area wineries. The Project would also allow 357 marketing events per year, including up to three nighttime events per week that could last until 10 p.m. in this quiet rural area.

Mr. Honig does not object to development of a new winery at this location, but instead to the massive size of the proposed facility, in terms of annual production, daily visitors and marketing events. It is the excessive size of this Project that would result in the many potential impacts discussed below. In an August 23, 2020 letter, our client requested the County continue the hearing on this Project to allow him adequate time to review the MND and other Project documentation and hire experts to review the potential noise, water use and other impacts of the Project. We renew that request and urge the Planning Commission to postpone consideration of this Project to give the community, which has had limited time to consider this Project, made even more limited by ongoing wildfires and preparations for harvest, more time to assess and provide comments on the

Project. Our client has discussed this Project with a number of neighbors and other community members and many have expressed similar concerns regarding the size and impacts associated with this Project. Additional time is required for us to form a coalition with these parties to jointly address concerns regarding the Project.

Included herein are our initial comments regarding the Benjamin Ranch Winery Project's potentially significant impacts. We intend to supplement these comments with more detailed information and expert input if the County moves forward with the Project as proposed. Attached to this comment letter is the Crane Transportation Group Peer Review of the traffic analysis for this Project, which found numerous flaws with the traffic study and concluded the Project would have significant and unmitigated adverse traffic impacts. Due to these impacts, the County is required to prepare an environmental impact report (EIR) for the Project instead of an MND. The County has failed to prepare a legally adequate initial study, improperly omitting consideration of potentially significant Project impacts and lacking evidentiary support for claims that Project impacts would be insignificant. The MND includes inadequate analysis for the Project's impacts related to greenhouse gas, noise, aesthetic, water supply and hazards. The County has also relied on an incomplete and misleading comparison of this Project to other wineries in the Napa Valley, improperly downplaying the oversized nature of the Project. An EIR is required to address the Project's many potential impacts and accurately describe the Project.

I. CEQA Requires Adequate Analysis of Potential Impacts.

CEQA serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) In connection with the Project's review under CEQA, the County has prepared an initial study and mitigated negative declaration. A lead agency prepares an initial study in order to determine whether an EIR, a negative declaration, or an MND is the appropriate environmental review document. (14 CCR § 15365, herein "CEQA Guidelines".) The initial study must consider whether any aspect of a project, either individually or cumulatively, may cause a significant adverse impact. (CEQA Guidelines § 15063(b)(1).) The purpose of the initial study is to provide the lead agency with adequate information regarding a project to determine the appropriate environmental review document and "documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment." (*Ctr. for Sierra Nevada Conservation v. County of El Dorado* (2012) 202 Cal. App. 4th 1156, 1170, citations omitted.) There must be a basis within the record to support the conclusions reached by the initial study. (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1201.) "Where an agency. . . fails to gather information and undertake an adequate environmental analysis in its initial study, a negative declaration is inappropriate." (*El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597, citations omitted.)

Failure to adequately analyze all of a project's potentially significant impacts or provide evidence to support conclusions reached in the initial study is a failure to comply with the law.

II. An EIR is Required When a Project May Have a Unmitigated Significant Impact.

Because issuing an MND truncates the CEQA process with often minimal environmental review, CEQA's "legal standards reflect a preference for requiring an EIR to be prepared." (*Mejia v. City of Los Angeles* (2005) 130 Cal. App. 4th 322, 332.) An agency proposing to rely upon an MND must make the analysis accompanying the proposed MND as complete and comprehensive as possible. (*Long Beach Savings and Loan Assn. v. Long Beach Redevelopment Agency* (1986) 188 Cal. App. 3d 249, 263.) When considering whether to require preparation of a full EIR or allow review culminating in an MND instead, a court will examine whether there is substantial evidence in the record to support a fair argument that the stated mitigation measures may not achieve the goal of reducing impacts below a level of significance. (*Citizen's Com. To Save Our Village v. City of Claremont* (1995) 37 Cal. App. 4th 1157.) An EIR must be prepared instead of an MND when there is substantial evidence to support a fair argument that the project may have significant adverse environmental impacts. (Public Resources Code § 21151.) "The fair argument standard is a 'low threshold' test for requiring the preparation of an EIR." (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.) If any substantial evidence of a potential environmental impact after the agency's proposed mitigation measures are implemented exists, then preparation of an MND is not appropriate, even if substantial evidence exists to the contrary. (Public Resources Code § 21080(d); CEQA Guidelines § 15064(f)(1); *Friends of "B" Street v. City of Hayward* (1980) 106 Cal. App. 3d 988, 1002.)

"[T]he significance of an activity may vary with the setting." (CEQA Guidelines § 15064 (b).) A development that may have minimal impacts in an urban setting could have significant impacts in a rural area. Courts show a clear preference for resolving doubts in favor of preparing an EIR. (*Architectural Heritage Association. v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1110; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1996) 42 Cal.App.4th 608, 617-618; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 151; *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602-03.) Here, there is substantial evidence to support a fair argument that the Benjamin Ranch Project may have numerous significant adverse impacts.

III. The MND's Analysis is Inadequate and Inaccurate and an EIR is Required.

A. The Project's Traffic Impacts Must Be Analyzed in an EIR.

The MND admits the Project may cause significant impacts due to traffic congestion, conflicts with transportation plans and vehicle miles traveled, but fails to disclose the full extent of these impacts and provide adequate mitigation. As set forth in the attached expert review of the traffic study prepared for the Project, the Project would have significant adverse traffic impacts that have not been mitigated to a less than significant level. (**Attachment 1**: Crane Transportation Group Peer Review.) These impacts include traffic congestion, conflicts with traffic plans, traffic hazards and emergency access, and vehicle miles traveled.

The Crane Peer Review found that the traffic impact study for the Project: relies on inaccurate and conflicting factual claims regarding the Project and surrounding area; lacks information necessary for a true analysis of impacts; fails to assess a major source of traffic impacts—truck traffic from the production facility; and improperly defers mitigation of the Project's traffic impacts. The Crane Peer Review concludes that the Project would result in significant unmitigable impacts, requiring preparation of an EIR.

While the Project applicant has submitted a traffic report, the disagreement between the applicant's expert and the expert Crane Peer Review necessitates the preparation of an EIR to analyze the Project's traffic impacts. "If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR." (CEQA Guidelines § 15064, subd. (g).) Thus, even if the County disagrees with the Crane Peer Review, an EIR must be prepared to resolve the disputes. (*City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229, 247-249 [expert disagreement about extent of a wetlands required preparation of EIR to resolve dispute]; *Friend of Old Trees v. Department of Forestry and Fire Protection* (1997) 52 Cal.App.4th 1383, 1398-1403 [expert dispute regarding project's impacts on water supplies required further environmental review].)

The Project's traffic impacts, particularly the congestion caused by the significant increase in traffic, could also result in adverse impacts for emergency access routes. Wildfires have unfortunately become common in the Napa Valley and unmitigated traffic levels, at the Project and cumulative level, could adversely impact resident's ability to evacuate during emergencies. The MND fails to adequately analyze the Project's impact on emergency access. An EIR is required to analyze these potentially significant safety impacts on human beings. (CEQA Guidelines § 15065, subd. (a)(4).)

B. The MND's Analysis of Greenhouse Gas Impacts Is Inadequate.

CEQA requires agencies to “make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” (Guidelines § 15064.4, subd. (a).) The California Supreme Court recently ordered agencies to “ensure that CEQA analysis stays in step with evolving scientific knowledge and state regulatory schemes.” (*Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497, 519.)

By failing to accurately disclose and adequately mitigate traffic impacts, the MND also fails to disclose the Project's impacts on greenhouse gases. Greenhouse gases would be emitted through construction, agricultural processes, wine fermentation, electricity use, construction, and production facility, winery and visitor vehicles, among others. The MND fails to provide any data, projections, or quantification of the Project's likely greenhouse gas impacts. CEQA requires an environmental document to “find out and disclose all it reasonably can.” (CEQA Guidelines § 15144.) The MND fails to do this, stating only that the Project's emissions would be “relatively modest” and would not exceed the 1,100 metric tons carbon dioxide equivalent threshold of the Bay Area Air Quality Management District. (MND pp. 20-21.) An EIR is required that discloses the Project's greenhouse gas emission calculations.

The MND's conclusion that the Project's greenhouse gas emissions would not be significant also appears to rely on voluntary greenhouse gas-reduction methods including green roofs, water recycling, solar water heating, energy conserving lighting, and shade trees. (MND p. 21.) While these measures are to be applauded, they are not actually incorporated into the Project as mitigation measures and do not appear to be specific or enforceable. Moreover, the MND contains no detail about the measures or about their likely efficacy. Environmental document must evaluate the efficacy of mitigation measures. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645.) Without this evaluation, any reliance on these measures to mitigate the Project's greenhouse gas emissions lacks substantial evidence.

C. The MND's Analysis of Water Supply Impacts is Inadequate.

The Project would add a 475,000-gallon production facility, 400 daily visitors and a number of large market events, but the MND claims the Project only would increase water use by 2.33-acre feet per year. There is inadequate evidence to support a claim of such a small increase in water usage for such a large development. If the Project moves forward as currently proposed, Mr. Honig intends to provide the County with expert review of the water usage claims relied upon by the MND, but was unable to procure

such a report prior to the Planning Commission hearing due to the time constraints set forth in his August 23, 2020 letter to the County.

In addition to the lack of support for the Project's claimed water usage, the MND also relies on an improper hypothetical baseline for irrigation water usage. (CEQA Guidelines § 15125, subd. (a).) Instead of using the measured water usage for current irrigation at the Project site, the MND relies upon a significantly higher baseline water usage estimate. (MND p. 23.) The MND fails as an informational document by relying upon hypothetical conditions as the baseline instead of the existing conditions. (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 322-325.) A project's impacts are determined by comparison to the baseline conditions and improperly inflating the baseline by relying on hypothetical conditions fails to allow for an accurate assessment of this Project's impacts.

Further, the MND does not include a well test to determine the impact of the Project's increased water usage on area wells. Without such information, the County lacks substantial evidence to find the Project's water supply impacts would be less than significant.

D. The Project's Noise Impacts Would Be Significant in Quiet Rural Area.

The quiet rural Project area would be adversely impacted by the numerous nighttime events held at the Project until 10 p.m. several times per week. (MND p. 2.) The area surrounding the Project site, which includes several residences, is extremely quiet after 6 p.m., when other winery operations shutdown. Due to the existing quiet and the topography of the area, sound carries great distances in the vicinity of the Project site. The MND fails to provide an adequate analysis of the noise impacts of nighttime events, the new production facility, and the 400 new daily visitors and their associated traffic noise.

E. The MND Fails to Adequately Address Aesthetic Impacts.

1. The Project Would Impact Views from a Scenic Highway.

Highway 128 was recently designated a scenic highway, and as such, CEQA requires an analysis of the Project's impacts on views from this scenic highway. The MND claims that this impact would be less than significant, but fails to provide evidence necessary to support such a determination. The MND fails to include renderings or visual simulations of the Project from Highway 128. The Project would include the removal of redwood trees that are clearly visible from Highway 128, but the MND fails to disclose this visual impact. Additionally, the lack of visual simulations from Highway 128 prevent an adequate analysis of the visual impact the new construction of the 79,623

square foot production facility and 7,669 square foot visitors' center. Because these buildings would be constructed on a floodplain, fill is required to elevate the grade height prior to construction. This adds to the visual impact of the production facility, which reaches a height of 37.5 feet.

2. The MND Fails to Adequately Evaluate Nighttime Lighting Impacts.

The MND also fails to adequately analyze the nighttime lighting impacts of allowing events extending until 10 p.m. at least every weekend. The Project site is located in a rural area that is quiet and dark after 6 p.m. The intrusion of this new nighttime lighting source must be thoroughly evaluated.

F. Potential Impacts Associated with Prior Use of Hazardous Substances Must Be Evaluated.

The history of the Project site includes is agricultural use as far back as the 1950s. At that time, many chemicals were used for pest control and other uses that have since been discovered to be hazardous to human health. The new construction included in this Project would require disturbing soils that could contain such hazardous substances. The County should require soil testing to determine whether it contains hazardous substances, and if so, mitigation must be imposed.

G. The County Staff Report Relies Upon an Improperly Skewed Comparison to Other Facilities, Failing to Acknowledge the Project Would Be One of the Largest in the County.

The County staff report for the Project includes a comparison of the proposed Project to other winery facilities, but this comparison fails to give the public a complete picture of the Project, downplaying the extent and impact of the development. (Winery Comparison Analysis and Project Summary.) This comparison analysis for the production size of nearby wineries with the Project appears to exclude several smaller wineries in the area. Moreover, even the information provided demonstrates that the Benjamin Ranch Winery would have one of the largest production levels in the area. Moreover, when the Project is compared to the 502 wineries throughout the Napa Valley for which data is available, the Project would be in the top 16 percent of all wineries for production levels.

The comparison chart also misleadingly compares the Project to wineries in the area with the largest marketing events, instead of to other wineries in the vicinity or throughout the Napa Valley. When compared to that same 502 wineries, Benjamin Ranch Winery would be in the top 3 percent for number of events annually and top 4 percent for number of guests. This comparison demonstrates the oversized nature of the

proposed Project. Without it, the MND and County staff report fail to give the public a complete picture of the Project, downplaying the extent and impact of the development. The information contained within the MND is to be used as a basis for the decision on what would be the least impactful means for the project to proceed. “An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” (*McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District* (1988) 202 Cal.App.3d 1136, 1143.) This more detailed and accurate comparison is necessary to inform the public and decision makers of the Project’s potential impacts, both direct and cumulative, and its precedent setting size for new development in the Project area.

Conclusion

Thank you for considering our comments. We look forward to the County’s preparation of an EIR for this Project that carefully considers the direct and cumulative environmental impacts of the Project and that contains a thorough analysis of alternatives and mitigation measures designed to reduce and avoid these adverse impacts on Napa County.

Sincerely,



Amy Minter

Enclosure: Crane Transportation Peer Review

cc:

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ATTACHMENT 1

CRANE TRANSPORTATION GROUP

PEER REVIEW OF THE FRANK FAMILY BENJAMIN RANCH WINERY PROJECT TRAFFIC IMPACT STUDY – NAPA COUNTY BY W-TRANS, FEBRUARY 4, 2020

A. INTRODUCTION

The following is a peer review conducted by Crane Transportation Group (CTG) of the Frank Family Benjamin Ranch Winery Project Traffic Impact Study prepared by W-Trans, February 4, 2020. This peer review has been prepared at the request of Michael Honig, of Honig Winery.

B. OVERALL ISSUES

1. The County of Napa should have approved the scope of work for this study, however, there is no clear indication that the County was directly consulted for this purpose.
2. The Use Permit Application for the Frank Family Benjamin Ranch Winery Project contains data that are inconsistent with the traffic study prepared for the project. Specifically, the Winery Traffic Information/Trip Generation Sheet included in the Use Permit file cites 46 fulltime and 5 part time employees during a typical weekday, while page 1 of the traffic study cites a proposed “46 fulltime and 15 part time employees on a typical daily basis.” Either the Use Permit Application or the input to the Traffic Impact Study requires update to be made consistent with the current definition of the project.

C. SPECIFIC ISSUES BY TOPIC

1. Evaluation of Appropriate Roadways and Intersections, as Determined by the County of Napa

Page 5 of the traffic study lists three study intersections, but does not say if these specific intersections were required by the County of Napa for analysis, or if the County was consulted on the scope of the analysis. The study does not include analysis of arterial Level of Service as is frequently required by the County.

2. Project Trip Generation Rates

Page 14 of the traffic study states that the ITE “Winery” LU # 970 trip rate was used for

the 2,124 square foot portion of the winery building that would house the tasting room, and references Table 6. However, Table 6 uses 3,140 square feet (3.14 ksf). These statements are conflicting, and require correction.

According to ITE, for the purposes of this land use, the independent variable “1,000 sq. foot gross floor area” refers to the square footage of the building that houses the tasting room. It may be most appropriate to use the 2,124 square foot portion of the winery building, referenced in the traffic study, that is specific to tasting room use. It would also be helpful for the traffic study to include an explanation of the square footage components of the total visitor’s center building (7,669 square feet as shown on the site plan cover sheet Code Synopsis) in order to understand the use of the 3,140 square feet referenced in Table 6.

The ITE 10th Edition Trip Generation “Winery” LU # 970 trip rates applied in the traffic study are subject to question. For example, the County of Napa generally directs use of Friday and Saturday data, rather than “weekday” and “weekend.” The traffic study uses the weekday PM peak hour rate of 7.31 per thousand square feet rather than a Friday PM peak hour rate of 10.93 per thousand square feet. The traffic study applies a Saturday PM peak hour average rate of 36.5, when application of the available fitted curve equation might result in a trip generation rate more specific to the project.

The resulting analysis states that there would be 23 weekday PM peak hour trips and 115 Saturday PM peak hour trips. Why so many Saturday PM peak hour trips? Recent traffic counts (September 13 and 14, 2019) conducted at the public access to the Mondavi Winery resulted in a Friday PM peak hour total of 59 trips and a Saturday PM peak hour total of 96 trips. Why would the Frank Family Benjamin Ranch Winery, located on Conn Creek Road, have more traffic on a Saturday PM peak hour than one of the most famous wineries in the Napa Valley located on State Route 29? This should be explained in the context of proposed visitor trips, preferably by use of a table showing hourly anticipated inbound and outbound visitors throughout the business day for typical Friday and Saturday conditions.

3. Trip Distribution Patterns and Percentages

a. Trip distribution requires explanation. Why is it that the majority of inbound project traffic from Silverado Trail is from the north while 100% of outbound traffic is to the south? Why is it that at SR29 the inbound traffic is split 50%/50% northbound and southbound, while outbound traffic is 100% to the north?

b. There is no mention of truck traffic volumes in the traffic study. However, the winery will have trips related to haul of grapes during harvest. The project Use Permit application “Winery Traffic Information/Trip Generation Sheet” shows crush Saturday conditions with 33 daily truck trips. The traffic study should address these trips.

4. Signal Warrant Analysis is Missing

Signal warrant analysis should be shown to support the statement, used several times in the traffic study, that signalization of the SR 29/Rutherford Road and Silverado Trail/Conn Creek Road intersections would mitigate conditions at both intersections. The study contains no signal warrant analysis.

5. Parking Demand

Page 28 of the traffic study cites the Napa County standard per car occupancy rate at 2.8 persons, and this is correct for Saturdays, but not for weekdays. The Napa County weekday standard is 2.6 persons per car. Use of this slightly more conservative factor, applied to a weekday with a maximum of 400 visitors over the course of the day would result in a parking space demand of 61 for employees (assuming 1 parking space per employee), and 38 for guests (conservatively assuming one-quarter of the guests – 100 - parked during any one hour), for a total 99 parking spaces, or five more than included on the site plan (94 spaces), and two more than the 97 spaces recommended in the traffic study.

Use of the 2.6 persons per car rate would also change the parking calculation for the 150-attendee events and the 24-attendee events. Event parking should also take into account any needed additional parking spaces for additional staffing, caterers, musicians and entertainers.

It is recommended that the study provide a parking demand matrix, with a marketing event occurring, by hour for a harvest Friday and Saturday.

6. VMT (Vehicle Miles Traveled)

The traffic study correctly identifies the need for addressing VMT in the context of maintaining air quality by reducing vehicle emissions. However, the analysis provided on page 23 and in Table 11 pertains only to employee trips, with no mention of visitor trips. This issue should be revisited when the County's new VMT methodology is approved.

7. Need for Transportation Demand Management (TDM) Plan

The traffic study contains the beginnings of a Transportation Demand Management (TDM) Plan. Because the project would result in substantial increases in traffic at intersections currently operating unacceptably, a serious effort at peak hour trip reductions should be considered. Such a plan should include a TDM coordinator.

8. Accidents

- a. Page 6 of the traffic study states that the Silverado Trail/Conn Creek Rd (SR128) intersection has a higher number of collisions than the state average, but

there is no safety concern because these were non-injury accidents. Is this an opinion, or based on a standard Caltrans has established?

b. The study does not provide accident data in the vicinity of the project driveway.

9. Bike Routes

While future bike lane plans are detailed, existing bike route descriptions are vague (see page 7 of the traffic study).

10. Road Surface

The project will add traffic, including large trucks, to the deteriorating pavement condition of Conn Creek Road. The traffic study should describe the existing roadway condition and include mitigation consisting of a before-and-after pavement inspection that would require the project to make improvements to the roadway as needed.

11. Intersection Geometrics

The description of study intersections should include the observation that although the Conn Creek Road approach to Silverado Trail is flared to allow for right-turning vehicles to separate from through or left-turning vehicles, this is not always possible. A through or left-turning vehicle can obstruct access to the right-turn flare. The same is true for the Rutherford Road approach to State Route 29; the flare provided for right turns is not always accessible if a left-turning vehicle obstructs access to the right-turn flare.

12. Unsignalized Level of Service Criteria

The traffic study shows and discusses both overall intersection LOS and Minor Street approach LOS for unsignalized intersections. If the county only recognizes Minor Street approach LOS and delay for significant impact evaluation, then the inclusion of overall Intersection LOS is unnecessary and confusing (see page 10 of the traffic study). Similarly, does the County permit mitigation based on overall intersection delay as described in traffic study pages 19 and 20?

13. Roadway Directions

Throughout much of the study Silverado Trail is referred to as a north-south roadway, but in Table 10 on page 23 it is assumed to be an east-west roadway. This is confusing.

14. Access Intersection Level of Service - Data Missing

Page 26 – why is there a Level of Service delay given at the project driveway but no LOS worksheets or volumes provided in the study?

15. Significant Unmitigable Project Impacts

The traffic study identifies significant impacts at the Rutherford/ SR 29 and Conn Creek Road/Silverado Trail intersections. It recommends an improvement measure for the Silverado location, but it is unclear whether this mitigation has been discussed with the County. There is no mitigation for the Rutherford Road/SR 29 intersection except to develop measures to reduce trips. It is notable that none of the mitigations include reducing visitation. If investigated, it will probably be found that a significant reduction in visitation throughout the afternoon will be required to reduce significant impacts during the three to four peak traffic hours of every Friday and Saturday afternoon.

As analyzed, the traffic study concludes that the project would result in significant, unmitigable impacts. Thus, it is anticipated that an EIR will be required. This would be an opportunity to revise the traffic analysis.

This Report is intended for presentation and use in its entirety, together with all of its supporting exhibits, schedules, and appendices. Crane Transportation Group will have no liability for any use of the Report other than in its entirety, such as providing an excerpt to a third party or quoting a portion of the Report. If you provide a portion of the Report to a third party, you agree to hold CTG harmless against any liability to such third parties based upon their use of or reliance upon a less than complete version of the Report.