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*Making Conservation
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Dana Ayers, Project Planner
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1195 Third Street, Suite 210
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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
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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