



February 12, 2025

Ryder Dilley
Associate Planner
City of Napa

Potential Effects of the Applicant's Voluntary Measures

Dear Ryder:

The applicant for the Napa Glamping Campground Project (proposed project) has elected to include voluntary modifications to the project plans (Voluntary Measures). It should be noted that the proposed Voluntary Measures are not mitigations required to address any potential impacts identified in the Initial Study/Mitigated Negative Declaration (IS/MND). The Voluntary Measures include the following:

- Modify the entry to allow only a right-turn in and out using an island and signage. The applicant has indicated that they will contact navigation application creators and ask to have all trips inbound routed from the north.
- Add an eight-foot paved shoulder along project frontage north of the driveway.
- Set the gate back from the entry a sufficient distance to allow up to three cars to queue if the gate is closed.
- Should the project have any issues with backup at peak times, the gate can be opened during those times.
- Widen the five-foot sidewalk to a minimum of eight feet of paved width along the project frontage to create a Class I multi-use trail.
- Extend the trail to the south beyond the project frontage to connect to the existing sidewalk at Milliken Creek to the extent that there is right-of-way to accommodate these improvements.
- Add a secondary Emergency Vehicle Access (EVA) at the southern end of the parking lot for emergency ingress/egress purposes only.

The following discussion describes the potential for environmental impacts resulting from implementation of the applicant's Voluntary Measures.

Air Quality:

Voluntary measures, including addition of a paved shoulder, wider sidewalk, trail extension, and secondary emergency vehicle access, may result in some additional construction beyond modeling assumptions for the air quality analysis. As shown in Table 2 (Estimated Construction Maximum Daily Air Pollutant Emissions [lb/day]) of the IS/MND, construction of all project components is calculated to be well below Bay Area Air Quality Management District (BAAQMD) thresholds. Worst-case emissions relative to a threshold would be oxides of nitrogen (NOx) emissions during the first year of construction. The project is calculated to result in maximum emissions of 36 lbs/day, 67% of the BAAQMD threshold of 54 lbs/day. These emissions primarily result from operation of off-road equipment during the site preparation phase. The voluntary measures are modifications to the existing development footprint and would require the same construction activities assumed for the project, such as site prep and material placement. The improvements would likely be incorporated into the assumed

construction schedule and require the same construction fleet. As such, maximum daily emissions from on-site use of construction equipment would be the same as calculated for the project. Some additional import of building material would be required. The maximum emissions from truck trips were calculated to be to NOx emissions of 4 lbs/day from 38 haul trips per day during the grading phase. Therefore, even if double the assumed truck trips would occur on the same day that the maximum off-road construction fleet was required on-site, implementation of the voluntary measures would not cause project construction to exceed a BAAQMD threshold.

Greenhouse Gas Emissions (GHG):

Additional construction of the voluntary measures would result in a minor increase in GHG emissions from the increase in total construction effort. The best management practices (BMPs) listed in GHG Mitigation Measure GHG-1 would continue to be required, consistent with BAAQMD recommendations.

Hydrology and Water Quality:

Voluntary measures, including addition of a paved shoulder, wider sidewalk, trail extension, and secondary emergency vehicle access, may result in some additional impervious surfaces beyond what was analyzed in the IS/MND. This negligible increase in impervious surfaces would not significantly alter the proposed drainage patterns. As described in the IS/MND, infiltration would be maintained through project design, including the self-retaining areas, permeable pavements, proposed landscaping, and the open space on the site, to avoid polluted runoff and flooding on and off site. As specified in City of Napa Policy Resolution No. 27, the applicant would submit a drainage and grading plan designed in accordance with Policy Resolution No. 17 and the City of Napa Public Works Department Standard Specifications to the Public Works Department for approval. Additionally, the project would be required to comply with the applicable measures identified in the City of Napa Municipal Code, the City of Napa Standard Specifications and Standard Plans, the City's "BASMAA Post-Construction Manual", and the State Water Resources Control Board (SWRCB) General Permit Order 2022-0057-DWQ.

Noise:

Construction of the voluntary measures would require a similar construction fleet and occur within or adjacent to the assumed construction area for the project. Therefore, construction noise would be substantially similar to the project. Noise from construction would be approximately 73 dBA at 200 feet, and would not exceed the Federal Transit Administration (FTA) threshold of 80 dBA beyond approximately 100 feet of the construction area. There are no sensitive receptors within 100 feet of any voluntary measure footprint.

Transportation:

Attachment 1 to this Memorandum provides a discussion of the effects of the proposed Voluntary Measures on the analysis in the Transportation Impact Study prepared for the proposed project.

Sincerely,



Darin Neufeld, AICP
Director, Environmental Planning + Compliance

Attachment 1 – Supplement to the “Transportation Impact Study for The Grange Project”



January 29, 2025

Mr. Darin Neufeld, AICP
Harris & Associates
600 B Street, Suite 2000
San Diego, CA 92101

Supplement to the “Transportation Impact Study for The Grange Project”

Dear Mr. Neufeld;

Subsequent to the completion of the “Updated Transportation Impact Study for The Grange Project” (TIS), August 7, 2024, modifications were made to the plans by the applicant, as shown on the enclosed site plan. It is noted that the proposed changes are not mitigations required to address any potential impacts identified in the Initial Study. It is further noted that the project name is no longer “The Grange” but as this was included in the title of the TIS, it is referenced as such here. The project is now being called the Glamping Zoning Text Amendment or Glamping Campground.

The focus of this letter is to address how these changes affect the analysis as presented in the TIS.

Project Changes

The modifications made to the project’s plans include the following elements.

- Modify the entry to allow only a right-turn in and out using an island and signage. The applicant has indicated that they will contact navigation application creators and ask to have all trips inbound routed from the north.
- Add an eight-foot paved shoulder along project frontage north of the driveway.
- Set the gate back from the entry a sufficient distance to allow up to three cars to queue if the gate is closed.
- Should the project have any issues with backup at peak times, the gate can be opened during those times.
- Widen the five-foot sidewalk to a minimum of eight feet of paved width along the project frontage to create a Class I multi-use trail.
- Extend the trail to the south beyond the project frontage to connect to the existing sidewalk at Milliken Creek to the extent that there is right-of-way to accommodate these improvements.
- Add a secondary Emergency Vehicle Access (EVA) at the southern end of the parking lot for emergency ingress/egress purposes only.

Effect on the Analysis Prepared

The changes as proposed would generally result in improved access for pedestrians and cyclists as well as emergency vehicles. While access for vehicular traffic would be limited to right turns and therefore constrained compared to conditions without the proposed restrictions, the only part of the analysis that included a consideration of access was the analysis of sight lines and need for a left-turn lane. The changes would make the left-turn lane warrant analysis and evaluation of sight lines to the south irrelevant; however, the report would otherwise remain valid.

Effect on Conclusions and Recommendations

While the proposed changes would result in some changes to travel patterns, if navigation applications can be programmed to route drivers to approach from the north, this would result in negligible changes to volumes and traffic patterns in the vicinity of the project from what would have been expected with full access. It is noted that there is no guarantee that this type of measure is feasible, so the applicant should include information on their website indicating that access is restricted to right-turns inbound, so drivers need to approach from the north (in the southbound direction). Other than the initial trip to the site, drivers should be aware of the access restrictions and can plan their trips to approach southbound on Silverado Trail. While some drivers would either miss seeing the access limitations or not use a navigation app and would still arrive traveling northbound and need to make a u-turn to access the site, this is expected to be a nominal number of trips. Many of these drivers would likely use the nearest public street, Hagen Road, to turn around. However, as the intersection with Silverado Trail is quite wide, there is adequate space for such maneuvers so this action would not be expected to introduce any hazards. Given the limited number of peak hour trips that are expected, the proposed access change can reasonably be expected to have an imperceptible effect on the traffic operations and analysis presented in the TIS.

The effect that the proposed changes would have on each of the four transportation topics identified in the California Environmental Quality Act (CEQA) is covered in more detail below.

Transportation Facilities

The project as initially proposed was determined to have a less-than-significant impact on pedestrian, bicycle, and transit facilities if the right-of-way were provided for the planned bike lane on Silverado Trail. Since the project as now proposed would not only provide the right-of-way but construct additional improvements providing connectivity for pedestrians and bicyclists, the project would improve these facilities, and the impact would remain less than significant.

The City's policies do not include requirements for an applicant to make improvements beyond the limits of their property. The applicant is, however, proposing an extension of their frontage improvements to connect them to adjacent facilities, providing there is right-of-way in which to construct such amenities. The project as currently proposed would provide a benefit, going beyond what is required by policy and therefore having a less-than-significant impact.

While some concerns have been raised about the need for cyclists to cross Silverado Trail for northbound trips from or to the site, providing facilities along the site's frontage for pedestrians and bicyclists is the limit of what is required of the developer. As noted above, the project as proposed goes beyond the minimum required by City policy. Closing gaps and completing the network and providing crossing opportunities is the responsibility of the City and/or Caltrans and would typically be addressed in a Local Roadway Safety Plan, Pedestrian and Bicycle Plan, or a similar document that addresses such needs on a citywide basis. It is beyond the scope of what is required of the project or as part of the traffic study, and therefore does not affect the significance of project impacts to bicycle facilities.

Vehicle Miles Traveled

The proposed project was determined to have a less-than-significant impact on vehicle miles traveled (VMT) for both guests and employees. The proposed changes to the project plans will result in some changes in trip routing; however, VMT is based on a high-level analysis that does not include consideration of access

restrictions. There are numerous places in Napa where median islands or one-way travel restrict access to adjacent properties. This condition is not accounted for in the travel demand modeling or other analysis methodologies. The change to the access to restrict it to right turns in and out only would therefore not affect the VMT analysis or findings.

Safety

The need for adequate lines of sight from the proposed driveway location was evaluated and it was noted that sight lines extend 600 feet to the north. While the proposed island would require drivers to initially stop a bit farther back, the section of Silverado Trail to the north is generally straight and flat so sight lines would remain adequate. Further, drivers would typically move forward across the crosswalk while waiting for oncoming traffic to clear, improving their sight lines to that measured in the field and reported in the TIS. It is noted that per Caltrans policy documented in the *Highway Design Manual, 2020*, sight distance is to be measured at a spot ten feet beyond the edge of the shoulder or 15 feet from the edge of the traveled way, whichever is greater. This means that sight lines are to be determined based on the geometry of the cross street, not where drivers are to stop on the driveway approach. Therefore, these adjustments to the project driveway would not affect the measurement of sight distance per Caltrans methodology.

It was determined based on existing peak hour traffic volumes and the anticipated trips associated with the project that neither a left-turn lane or right-turn deceleration lane would be warranted. While not required to address a potential safety impact, the modified project plans include a channelizing island that would restrict access to right turns in and out and the shoulder is being widened to provide space for right-turning traffic to decelerate outside the travel lane. A center island on Silverado Trail is not proposed. It is noted that these changes were made by the applicant of their own accord and not to address any kind of stated impact.

It is understood that residents living in the area have indicated that they believe Silverado Trail is operating unsafely. However, this is not consistent with the findings in the TIS that the collision rate for the study segment was lower than the Statewide average for similar two-lane highways in an urban setting (all roadways within city limits are considered to be urban for purposes of comparing collision rates). While the collision data is provided in the TIS, the existence or lack of safety issues as demonstrated by the collision rate is identified for informational purposes only. Because the project will undergo scrutiny by not only City staff, including the Fire Marshal, but also Caltrans staff, it is reasonable to assume that it has been designed and will be constructed to meet all applicable industry standards. It can therefore be presumed to remain a less-than-significant impact in terms of safety as it will not introduce any new hazards. Addressing any existing concerns is the responsibility of the City or Caltrans, and not a consideration under CEQA.

Similarly, some concerns have been raised about the potential for drivers to disregard the access restrictions and turn left into the site anyway. While the island will be designed to make such a movement difficult, and guests will be directed to approach from the north to avoid the need for such a maneuver, there remains a potential that drivers will violate the turn prohibition. Such actions cannot, however, be assumed nor can they be assessed in any meaningful way; people breaking the law is an enforcement issue, not a CEQA impact. If the project is designed to meet applicable standards, it is assumed that the impact will not introduce any hazards. Any attempt to address such actions would be speculative and unsubstantiated by fact.

Emergency Response

The project would have the required two points of access. Presuming these are designed to meet applicable codes and reviewed and accepted by the City’s code official, the project would be expected to have a less-than-significant impact as regards emergency response.

Other Topics

Some concerns have been raised regarding the timing of the traffic counts. As with most analyses, counts were obtained on the days when the project would have its peak activity, which for the proposed use is Fridays and Saturdays. The counts were taken on June 2 and 3, 2023, while local schools were still in session and during clear weather. The only aspects of the analysis that used these volumes were the collision rate calculations and the turn lane warrants. If the counts are higher on another day of the week, as has been suggested, that would have reduced the collision rate as the volume is used in the denominator. While the conclusion that a left-turn lane is not warranted might have changed had higher volumes been obtained, this point has become moot since left turns will be eliminated through the changes to the project access as currently proposed.

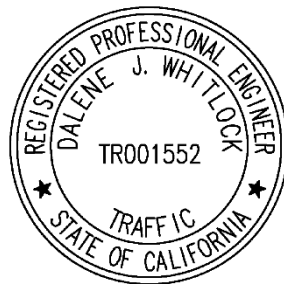
Conclusions

The TIS completed in 2024 remains adequate to address the potential transportation impacts of the project as currently proposed. No further analysis is needed to support the findings relative to the transportation issues identified in CEQA and the Initial Study/Mitigated Negative Declaration does not require updating to accurately reflect the projects potential impacts with the applicant’s proposed changes to the project plans.

Please let us know if there are any questions on this analysis. Thank you for giving us the opportunity to provide these services.

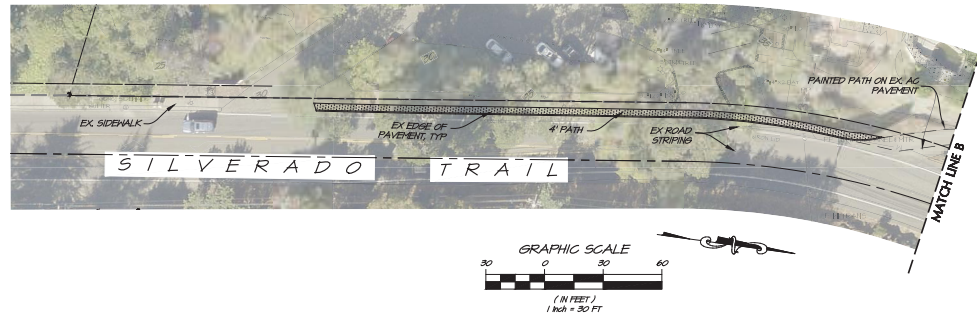
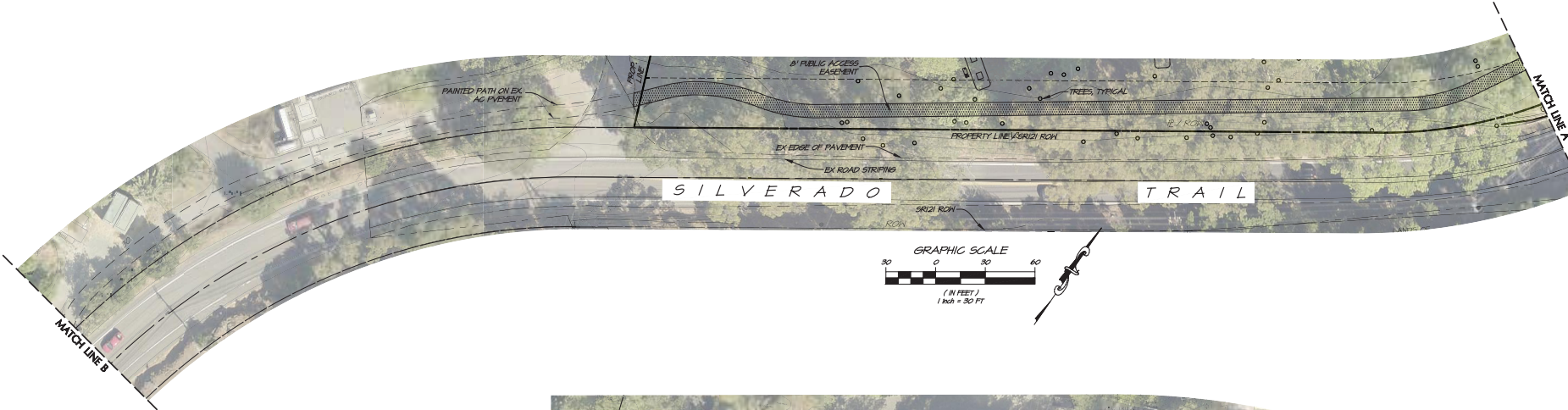
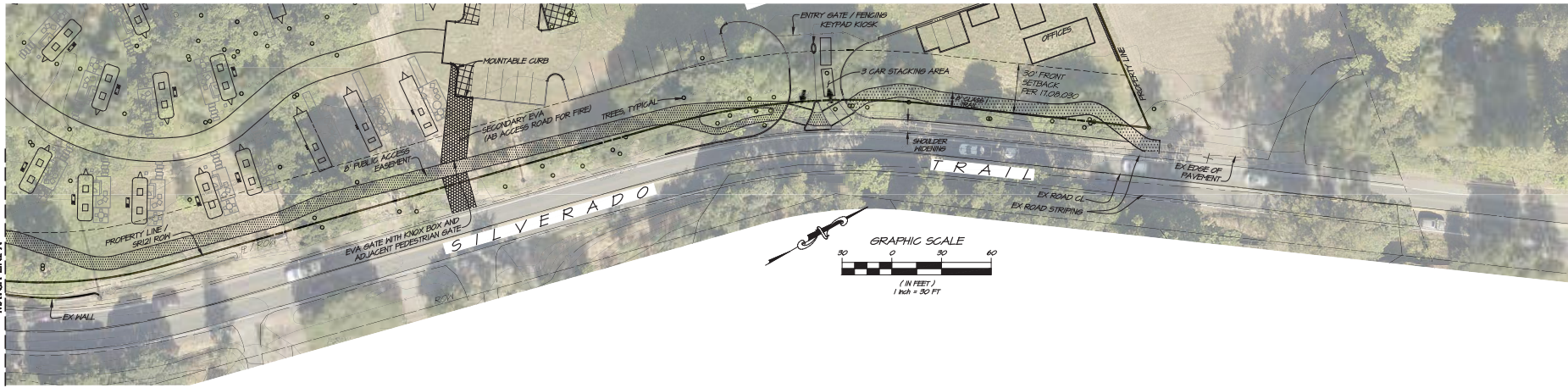
Sincerely,

Dalene J. Whitlock, PE, PTOE
Senior Principal



DJW/djw/NAP161.L2

Enclosure: Site Plan



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| NO. | DATE | REVISIONS | BY |
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**THE GRANGE CAMPGROUND
 SILVERADO TRAIL FRONTAGE**
 CALIFORNIA

SEAL OF THE BOARD OF SUPERVISORS
 NAPA COUNTY
 No. 12325
 Exp. 12.31.2028
 CIVIL ENGINEER
 STATE OF CALIFORNIA

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| DATE | JANUARY 04, 2023 |
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