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CALTRANS

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Mr. Brent Cooper, AICP  
Community Development Director  
City of American Canyon  
4381 Broadway Street, Suite 201  
American Canyon, CA 94503

**Broadway District Specific Plan- Draft Environmental Impact Report (DEIR)**

Dear Mr. Cooper:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Broadway District Specific Plan. 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) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the November 22, 2017 DEIR.

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***Project Understanding***

The City of American Canyon (the City) is preparing a Specific Plan to guide future development and land use activities along the Broadway Street Corridor, designated State Route (SR) 29, within the city limits. The Specific Plan establishes eight subareas - Downtown Core, Local-Serving Mixed Use, Home Improvement, Business Park, Broadway Residential, Medium Density Residential, the Northern Gateway, and the Southern Gateway - and associated zoning and development standards. The Specific Plan's buildout potential is 1,200 net new residential units and 850,000 net new square-feet (sf) of non-residential uses by 2036.

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***Multimodal Planning***

The Association of Bay Area Governments (ABAG) has identified the project location as a potential Priority Development Area (PDA), known as the Highway 29 Corridor (American Canyon), with a future place type of Mixed-Use Corridor, which emphasizes mixed-use development, transit, and pedestrian connectivity. PDA criteria includes plans for additional housing, and proximity within 0.5 miles of high frequency (peak headways under 20 minutes)

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bus or Bus Rapid Transit service, or proximity to a planned or existing rail station or ferry terminal. The existing transit in the area includes the VINE Transit routes 11 and 29, as well as American Canyon Transit, which provides both fixed route and on-call shuttle services. None of these transit routes or services operate with frequencies high enough to meet PDA requirements. Please provide a discussion on VINE Transit operations at maximum build-out.

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The Specific Plan prioritizes improving transit and active transportation access, which Caltrans applauds. Filling noted gaps in the sidewalk and bicycle facility will encourage active transportation and transit use and better accommodate walkable development patterns, and contribute to a reduction in VMT. The Circulation Element of the Draft Specific Plan notes that reconfiguration of SR 29 will allow for greater bus and active transportation access. The document also refers to the #17 Express bus route, which is not featured on any current schedule or timetable. The City should clarify which bus routes will be affected, how they will be affected, and identify how improvements to regional bus infrastructure and service will be funded, phased, and implemented. Establishing a high performance local and regional transit network would require operational enhancements to enable high frequency operations, zoning to ensure the density of uses and population, and improved pedestrian facilities to ensure walkability within station catchment areas; strategies for achieving this should be discussed in detail.

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The City, as Lead Agency, should ensure consistency with the *Napa Gateway Corridor Improvement Plan*, which is listed in the *Plan Bay Area 2040* projects list. The City should weigh cost and impact of pedestrian overcrossings at the intersections of SR 29 and American Canyon Road, Donaldson Way, and Napa Junction Road, noted in the DEIR as proposed in the *American Canyon Circulation Element*, versus at-grade intersection improvements and promoting transit. Caltrans requires that roundabouts be evaluated as an alternative for intersection modifications before signals are approved; the EIR should include Intersection Control Evaluation (ICE) data for Caltrans to review. Please also analyze the impacts of completing the proposed Newell Drive extension described in the *American Canyon Circulation Element*, which would connect to SR 29 at Green Island Road and provide a parallel route from Redwood Parkway in Vallejo to SR 29.

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The Specific Plan's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. These smart growth approaches are consistent with MTC's Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

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### ***Highway Operations***

The DEIR proposes a reduction in the speed limit on SR 29 from 50 and 55 miles per hour (MPH) to 35 MPH (The Specific Plan Circulation Element notes 30 MPH, this discrepancy should be clarified). The City will have to process this proposal through Caltrans for approval. This speed alternative should be included in the Traffic Analysis as an alternative for Caltrans to review.

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There are some inconsistencies with the data presented in the DEIR. On Page 3.12-5: Traffic Volumes; please use current volumes in the analysis and cite the data source. AM and PM impacts must be analyzed to properly develop mitigation to the SR 29 corridor. On page 3.12-42: Impact TRANS-2, the DEIR notes “For SR 29, there are no feasible improvements beyond the proposed widening to six lanes that the City of American Canyon can perform independently.” The City should clarify the extent of its commitment to widen SR 29 and outline funding commitments as well as other mitigation measures.

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Page 3.12-43: Impact TRANS-3 indicates that there is no feasible mitigation for significant unavoidable impacts to the congestion management plan. Caltrans is concerned with the ability to contain left-turning vehicles at major intersections with SR 29 within the available storage. A spillover of vehicles has the potential to create significant speed differentials and increase the number of conflicts. Another concern is the potential for queuing vehicles to encroach on the upstream intersection again creating the potential for significant conflict. CEQA does not exempt these type of operational concerns from evaluation. The DEIR fails to provide such an analysis or the data necessary to undertake an assessment. The City should provide an assessment of our concerns, and analyze potential mitigations at maximum buildout.

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### ***Vehicle Trip Reduction***

From Caltrans’ *Smart Mobility 2010: A Call to Action for the New Decade*, the Specific Plan Area is identified as **Place Type 5a: Rural Towns** where location efficiency factors, such as community design, are moderate to high and regional accessibility is low. Given the place type and scope of the Specific Plan, it should include robust Transportation Demand Management (TDM) Programs for associated projects to reduce VMT and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient access to and from the Plan Area and reduce transportation impacts associated with the Specific Plan. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit subsidies on an ongoing basis;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Showers, changing rooms and clothing lockers for employees that commute via active transportation;
- Emergency Ride Home program;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);

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- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the Specific Plan does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

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For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

### ***Transportation Impact Fees***

The City should identify project-generated travel demand associated with the Specific Plan and estimate the costs of transit and active transportation improvements necessitated by the proposed Specific Plan; viable funding sources such as development and/or transportation impact fees should also be identified. 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.

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The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is prepared for adoption along with the environmental document. 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.

### ***Travel Demand Analysis***

Please analyze VMT resulting from the proposed Specific Plan, including conditions of maximum buildout. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on VMT as the primary transportation impact metric. Please ensure that the travel demand analysis includes:

- A vicinity map, regional location map, and study area map that clearly shows access in relation to the STN. Ingress and egress for all Specific Plan components should be clearly identified. Clearly identify the State Right-of-Way (ROW). Driveways, local roads and intersections, car/bike parking, and transit facilities within the study area should be mapped and described in text.

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- A VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Draft Guidelines. Projects that result in automobile VMT per capita greater than 15% below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The Specific Plan's primary and secondary effects on pedestrians, bicycles, disabled travelers and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.
- VMT and multimodal analysis should cover the recommended projects in the American Canyon Pedestrian Improvement List from the *Napa Countywide Pedestrian Plan* (NVTA, 2016), and especially take into account the recommended "Option 2: The American Canyon Modified Boulevard Concept" and other alternatives from the *State Route 29 Gateway Corridor Improvement Plan* (NVTA, 2014), which was funded by Caltrans' Community-Based Transportation Planning Grant Program.

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### ***Cultural Resources***

The area of the Specific Plan is extremely sensitive for both archaeological and built resources. Per the California Environmental Quality Act (CEQA) Guidelines, to adequately identify and evaluate any potential historical resources, we recommend that the City of American Canyon conduct a cultural resource technical study that at a minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS) and a field survey of the project area by a qualified archaeologist and a qualified architectural historian. Additionally, per CEQA and Assembly Bill (AB) 52, we recommend that the City of American Canyon conduct Native American consultation with tribes, groups, and individuals who are interested in the project area and may have knowledge of Tribal Cultural Resources, Traditional Cultural Properties, or other sacred sites.

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If a Caltrans encroachment permit is needed for any projects conducted under the Broadway District Specific Plan, we may require project specific cultural resource technical studies be prepared in compliance with CEQA, Public Resources Code (PRC) 5024, and the Caltrans Standard Environmental Reference (SER) Chapter 2 (<http://www.dot.ca.gov/ser/vol2/vol2.htm>). Should ground-disturbing activities take place within Caltrans ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and the SER, all construction within 60 feet of the find shall cease and the Caltrans District 4 Office of Cultural Resource Studies (OCRS) shall be immediately contacted at (510) 622-1673.

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***Lead Agency***

As the Lead Agency, the City 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.

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***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 the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

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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](mailto:jake.freedman@dot.ca.gov).

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Sincerely,



PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse