California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

May 29, 2026

SCH #: 2026040915
GTS #: 04-NAP-2024-00636
GTS ID: 33825
Co/Rt/Pm: Napa/29/31.326

Hannah Spencer, Planner III
Napa County
1195 Third Street, Suite 210
Napa, CA 94559

Re: AXR Napa Valley Winery – Major Use Permit Modification, Variance, and Viewshed — Draft Mitigated Negative Declaration (MND)

Dear Hannah Spencer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the AXR Napa Valley Winery – Major Use Permit Modification, Variance, and Viewshed Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2026 Draft MND.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding
The proposed project is located at 3199 North Saint Helena Highway (State Route 29). The project includes modifications and expansions of an existing winery including construction of a new production cave, conversion of existing buildings into tasting rooms and accessory uses, expanding parking capacity, and adding a left-turn lane on State Route (SR) 29. With a new left-turn lane, the proposal includes the removal of six oak trees from Caltrans' Right-of-Way (ROW).

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle

Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide (*link*).

The project VMT analysis and significance determination are undertaken in a manner consistent with the County's adopted VMT policy. Per the MND, this project is found to have a less than significant VMT impact and has included a Transportation Demand Management Plan as part of the Conditions of Approval, therefore working towards meeting the State's VMT reduction goals.

Encroachment Permit
Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit. An Encroachment Permit application package will need to be submitted for the proposed modifications within the SR 29 ROW.

Please also submit a Visual Impact Assessment (VIA) Questionnaire (*link*) during the encroachment permit application. The VIA Questionnaire will determine the level of visual impact analysis required for this project. Visual analysis of potential impacts to the eligible scenic highway may differ from the aesthetic evaluation previously prepared for the project's parcel.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (*link*)
- Caltrans Encroachment Projects Processes – Information Video (*link*)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (*link*)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Design
The County previously coordinated with Caltrans for early review of the Traffic Impact Study (TIS) for this proposed project. Our previous comments have been acknowledged in the TIS and we are reiterating them in this letter as a reminder for the encroachment permit application stage.

Please ensure the location of the "Do Not Enter" sign proposed for controlling internal traffic flow is depicted on project plans to be submitted as part of the Encroachment Permit application package. Please also ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual (*link*) and Caltrans Standard Plans and Specifications (*link*). Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.).

Any proposed features that do not meet Caltrans Highway Design Manual (HDM) standards will require preparation and Caltrans approval of a Design Standard Decision Document (DSDD) to document and provide justification for the nonstandard features. The proposed project design presented in Figure 7.1 of the TIS contains several features that do not meet HDM standards. Examples include, but are not limited to, the proposed left turn lane width and shoulder widths.

The proposed left turn lane shall be 12' per HDM 402.(2)(a) Intersections at Grade – Left-turn Channelization: Design Elements, Lane Width, and shoulder widths shall be 8' per HDM 307.2 Geometric Cross Section – Cross Sections for State Highways: Two-lane Cross Sections for New Construction. The 5' shoulder at the creek/bike path may possibly be justified due to environmental impacts, but there is no apparent reason to not construct the turn lane to 12' width. DSDDs are to be submitted when requesting Encroachment Permit with final project plans for Caltrans review and approval. Please contact us for a copy of the DSDD template.

Pedestrian and Bicycle Planning
Please include a "Watch for Bikes" sign at the north project driveway (exit route) as cyclists are permitted to travel on SR 29.

Landscape Architecture
MND Mitigation Measure VIS-1: Mitigation measure VIS-1 proposes to solve removal of existing oaks at a later date and does not adequately resolve visual changes at the parcel south of the vineyard. Removal of these oaks causes a substantial reduction in

screening between the highway and this residence, which is essentially unscreened without the oaks. Character of this view would be quite different as a result, and the visual change is unlikely to be able to be minimized within the State ROW due to the need to establish clear recovery zones once the existing trees are removed. It is recommended to evaluate avoidance of project impacts to these trees wherever possible.

Exhibit C, Site Plans: Sheets G0.02E and G0.02P have a variance in the location of the highway. Please revise to show both roadway striping and edge of paving in the existing and proposed plans.

Exhibit I, Left Turn Lane Concept Plan: Engineering plans do not adequately capture existing tree impacts. Conform at and north and south of the residential parcel includes shifting a ditch toward existing trees, which will result in grade changes within existing tree canopies. Existing trees are native oaks that tend to be sensitive to root impacts including both cut and fill over roots. This area should be reviewed with project arborist and landscape architect to assess viability given the ditch changes.

Biological Resources
Please provide additional information on the project's potential to affect rare plants. Directly across SR 29 (near Ehlers Lane) there is an occurrence of a State and federally endangered plant species, Sebastopol meadowfoam (*Limnanthes vinculans)*. Caltrans recommends completing another plant survey and/or incorporating avoidance and minimization measures for rare plant species with potential to occur in Napa County. Overall, the MND minimizes the potential for rare plants to occur in the Caltrans ROW and elsewhere in the project limits. While Caltrans acknowledges there is low potential for rare plants to occur, there are several nearby records of rare plants, including along SR 29 within the State ROW. Additionally, please complete a survey for migratory birds and their nests as well as roosting bats prior to removing trees.

Cultural Resources
Caltrans agrees with the property determination for the project site, however it is unclear if the State Historic Preservation Officer (SHPO) concurred with this evaluation. It is recommended to obtain SHPO concurrence on the determinations. Portions of the property, particularly the rock wall, may be partially within Caltrans ROW and may therefore be a state-owned resource under Public Resources Code (PRC) 5024. Additionally, the project proposes work within the boundaries of the National Register eligible archaeological site and within Caltrans ROW. The proponent will need to provide cultural resource studies to demonstrate compliance with the California Environmental Quality Act (CEQA) and PRC 5024 as per Caltrans' PRC 5024 Memorandum of Understanding (*link*) to obtain encroachment permits to construct

within Caltrans ROW. This may include identification studies and treatment or archaeological data recovery plans.

For construction activities within Caltrans' ROW that would take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

Tribal Resources
It is recommended that the project applicant retain and compensate Tribes with ancestral ties to Napa County to perform Tribal Monitoring services. It is also recommended that the project applicant coordinate with the California Native American Heritage Commission (NAHC). The NAHC is the state agency responsible for identifying, protecting, and managing Native American cultural resources. They maintain a contact list of tribes with traditional or cultural ties to affected areas. It is important that NAHC provides the list of tribes and contacts to ensure inclusivity in the process. Below is the NAHC contact information.

> *Mailing Address*: 1550 Harbor Boulevard, Suite 100, West Sacramento, CA 95691
> *Phone*: (916) 373-3710
> *Email*: nahc@nahc.ca.gov

Project Coordination
The proposed project is within the vicinity of the Napa Valley Vine Trail gap closure project, on SR 29 between postmile (PM) 19.00 and 29.25, to construct Class I and Class III bicycle facilities. The developer should coordinate with Napa County Public Works as the lead for this project.

Hydrology and Water Quality
Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

The contractor must provide a Water Pollution Control Program (WPCP) and comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit because the Disturbed Soil Area (DSA) is less than one acre.

Vehicles and equipment shall be parked on pavement, maintenance vehicle pullout (MVP), existing roads, and previously disturbed areas to the extent practicable. In

environmentally sensitive areas, vehicle access to work sites shall be restricted to existing roadways.

If it is necessary to fuel onsite, no refueling will occur within 100 feet of a watercourse. No soil disturbance should be carried out during a rain event. The contractor will take care to ensure that no unnecessary disturbance of soil will occur. The contractor will do their best to restore the site to its original condition after work is complete.

The contractor will provide traffic control to provide a safe flow of public traffic and safe access area for all construction equipment entering and exiting the construction work area.

The contractor will provide street sweeping on a daily basis at construction entrance/exit locations and nearby paved areas during construction activities (as required) and end of workday.

Standard Specifications Section (13-2.01 Water Pollution Control Program), (13-4.01 Job Site Management), and (13-7.02 Street Sweeping) will apply towards this project. A link to Caltrans Standard Specifications is included in the Design section of this letter.

Within Caltrans ROW, the project shall comply with Caltrans standards and stormwater guidelines, relevant manuals, and applicable permits and ordinances according to Caltrans NPDES Permit.

For soil disturbance within Caltrans ROW:

1. Planning and Compliance
    a. Prior to the start of work, prepare a Water Pollution Control Plan (WPCP) or Project-Specific Best Management Practice (BMP) Plan in accordance with Caltrans Standard Specifications and the Project Planning and Design Guide (PPDG).
    b. The plan shall describe erosion control, sediment control, and spill prevention and response measures applicable to the work.
    c. Submit the plan to Caltrans for review and approval prior to implementation.
    d. The Contractor shall designate a responsible person to oversee and ensure proper implementation, inspection, and maintenance of all BMPs throughout the duration of the work.

2. Erosion and Sediment Control
    a. Install temporary erosion and sediment control BMPs, including fiber rolls, silt fence, and gravel bags, as necessary to contain sediment generated by construction activities.

b. Provide drainage inlet protection to prevent sediment from entering gutters, storm drain systems, or surface waters.
c. Protect exposed soil surfaces with plastic sheeting, tarps, or other approved covers during periods of inactivity and prior to forecasted rain events.
d. Stabilize disturbed areas upon completion of work using temporary erosion control measures, such as biodegradable mulch or temporary seeding, in accordance with approved BMP standards.
e. Sweep and remove all soil, cuttings, mud, and sediment from paved surfaces at the end of each workday. Do not wash materials into storm drains or drainage facilities.
f. When work occurs adjacent to or within proximity of a water body, implement appropriate construction BMPs to prevent pollutants and sediment from entering waters of the State.

3. Equipment and Material Controls
    a. Inspect and maintain all construction equipment to prevent leaks of fuel, oil, hydraulic fluid, or other hazardous materials.
    b. Place drip pans or absorbent materials beneath stationary equipment and at refueling or servicing locations.
    c. Maintain spill response kits on site at all times. Spill kits shall include absorbent materials, pads, and containment devices appropriate for the work area.
    d. Perform refueling and equipment servicing only in designated, contained areas, located at least 50 feet from storm drain inlets or water bodies, when feasible.
    e. Prior to starting work, implement basic erosion, sediment, and spill control BMPs appropriate for tree removal activities.
    f. The Permittee is responsible for ensuring BMPs are properly installed, maintained, and removed upon completion of work.

4. Erosion and Sediment Control
    a. Install fiber rolls, gravel bags, or silt fence as needed to contain soil and debris within the work area.
    b. Protect nearby drainage inlets to prevent sediment from entering the storm drain system. Cover exposed soil with plastic sheeting or tarps during rain events or when work is not active. Stabilize disturbed areas after tree removal using mulch, straw, or temporary erosion control measures.
    c. Sweep and remove soil, wood chips, and debris from paved surfaces daily. Do not wash materials into gutters or storm drains.
    d. When work occurs near a water body, prevent soil, debris, or pollutants from entering the water using appropriate BMPs.

5. Equipment and Material Controls
    a. Inspect equipment daily and maintain it to prevent leaks of fuel, oil, or hydraulic fluid.
    b. Use drip pans or absorbent pads beneath equipment when parked or serviced.
    c. Keep a spill kit on site and available at all times.
    d. Refuel equipment in a controlled area, away from storm drains and water bodies, when feasible.

Construction-Related Impacts
Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Equitable Access
If any Caltrans facilities are impacted by the project, those facilities must meet Americans with Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Sincerely,

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse