George Caloyannidis 2202 Diamond Mountain Road Calistoga, CA 94515 calti@comcast.net

May 1, 2012

Mr. Ken MacNab City of Calistoga, Building & Planning 1232 Washington Street, Calistoga

SILVER ROSE PROPOSED DEVELOPMENT

COMMENTS REGARDING CIRCULATION

The impact of the proposed development on the Circulation Element of the General Plan was not adequately addressed by Staff and the Planning Commission.

- A. STATE OF CALIFORNIA GENERAL PLAN GUIDELINES (Pg. 55-60)
- The circulation element is not simply a transportation plan.
- By statute, the circulation element must correlate directly with the land use element.
- The provisions of a circulation element affect a community's physical, social and economic environment as follows:

Physical:

The circulation system is one of the chief generators of physical settlement patterns.

Social:

The circulation system has a major impact on areas and activities it serves, on community cohesion and the quality of human life.

Economic:

The community's economy is directly affected by the circulation element. The efficiency of a community's circulation system can either contribute to or adversely affect its economy.

Three California appellate cases (Calaveras, Tuolumne, Mendocino) have established the correlation between the circulation and land use elements.

Among the mandatory circulation element issues as defined in statute are:

- Transportation routes
- Other local public utilities and facilities
- Parking facilities

- Assessing the adequacy of exiting on- and off-street parking, particularly in urban and commercial areas.
- Assessing the effect of parking policies
- Assessing the need for bicycle parking

B. CITY OF CALISTOGA CIRCULATION ELEMENT (CIR8-29)

The City's General Plan has done a good job in complying with the State's guidelines. It mandates:

- Provide sufficient parking in the Downtown
- Although there is a documented parking shortage during peak visitor periods (2003), the City cannot accommodate increased parking demand indefinitely. Building large additional parking lots in the downtown would negatively impact the vibrant, pedestrian friendly environment that is one of the downtown's most appealing qualities.

Actions:

- After realignment of the Silverado Trail/Lincoln Avenue intersection, the City shall investigate the need for and feasibility of closing Brannan Street to through traffic, or implement other traffic calming measures in order to prevent or reduce the use of this local street for regional through traffic.
- Conduct a parking study in summer 2003 that evaluates current downtown parking supply against current and projected demand, and make recommendations regarding development and locations for additional downtown parking.

C. THE SILVER ROSE TRAFFIC STUDY

The study projects that the proposed project will generate an average of 1,163 additional daily trips of which 65% (756) will be towards Calistoga of which 30% (227) will use Brannan Street. It further recommends a future left turn pocket on Brannan Street towards which it proposes to contribute \$85,857.

However, since the creation of the General Plan, the Solage resort and 20 more housing units on Brannan Street have been added so that it's above cited *Actions* are that much more urgent today. Accordingly, the entire 756 project generated vehicle trips to Calistoga must be routed through the Lincoln intersection.

Yet, the traffic study considers collision data only at the Brannan, an intersection which ought not to be used and avoids the pertinent ones at Lincoln Avenue.

Silverado Trail/Lincoln Avenue Intersection

According to the California Highway Patrol 2004–2009 records (last available) published by the Statewide Integrated Traffic Records System (SWITRS), this intersection has a collision rate of 0.98 per million entering (c/mve) which is more

<u>than double the state wide average</u> of 0.41 c/mve for similar facilities over the same 5-year period.

It is disconcerting that the City after having spent tens of thousands of dollars on studies, has allowed the long standing Caltrans funding for its realignment to expire.

D. CONCLUSIONS:

<u>Solely from a circulation point of view</u>, unless the proposed project is reduced to less that 1.5 times the FAR 0.08 density of Solage (see related analysis elsewhere) the City should not approve the proposed project without prior resolution of the following circulation element issues:

- This project's magnitude will further degrade the collision prone Silverado Trail/Lincoln Avenue intersection. This intersection must be realigned to safe levels before it can accommodate such a project. As per the General Plan and Urban Design Plan mandates, the project must "participate in the funding of these improvements". However, participating in the funding of a plan which the City consistently has delayed to formulate is not possible at this point.
- Without a properly designed realignment of the Lincoln/Silverado Trail intersection there can be no further significant development along the Silverado Trail corridor.
- The demand for additional parking in the Downtown will be significant. The study addressing the associated parking needs and their related impacts as mandated by the General Plan is 9 years overdue and must be completed or the City is not in compliance.
- With the exception of Downtown hospitality development, there can be no significant resort development without a comprehensive downtown parking action plan.
- The City must assess the impact of the project's three <u>rather than one</u> entry/exit points to the Silverado Trail (two directly on it and one of increased intensity at Rosedale) which add an unnecessary number of new left turns on the highway (1,163 daily trips). Their impact on the regional Silverado Trail traffic has not been addressed by the traffic study.
- The safe crossing of the Silverado Trail for bikers and pedestrians from the project must be resolved.
- As is clearly expressed in the State's General Plan Guidelines, failure to address the circulation issue of a project in the appropriate manner may affect community cohesion, the quality of life of citizens and may adversely affect the economy of a community. The City of Calistoga can not afford to go down that road.