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# Napa County Roads & Streets Standards Exception Letter

Howell Mountain Cemetery P20-00030  
Planning Commission Hearing Date (June 17, 2026)



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**Napa County Public Works**

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**Steven E. Lederer**  
Director

April 6, 2026

Howell Mountain Cemetery  
1225 Howell Mountain Road

**Subject:** Left Turn Exception Request; Howell Mountain Cemetery Use Permit Request #P20-00030; APNs 018-120-016 and 027

Thank you for your Traffic Impact Study (TIS) dated December 13, 2023, describing your request for an exception from the Napa County Road and Street Standards, which would otherwise require installation of a left turn lane at the entrance to the project driveway at 1225 Howell Mountain Rd. (HMR). The requirement is prompted by the property owner's request for a Use Permit Modification (#P20-00030) to operate a Cemetery at this site.

**Basis for Request:**

In support of your request, you offer that:

1. A code compliant left-turn lane (LTL) will require impact to a substantial number of heritage Redwood trees and other vegetation. These trees are an important part of the ecosystem in this area.
2. The LTL will require grading of relatively steep rock slopes, and damage or remove their related trees. These slopes are also an important part of the aesthetic of this area.
3. Sight distance extends approximately 180 feet to the west and 260 feet to the east. To maintain adequate site distance over time, the project has been conditioned (Condition 2 to Public Works Memorandum dated 5/27/25) to trim and maintain vegetation as recommended in the TIS, Figure 7.
4. For those cars that do need to make a left turn into the driveway, there is adequate sight distance to allow cars to see a turning vehicle and stop to avoid it.

**Documents Reviewed**

1. Traffic Impact Study Dated December 13, 2026
2. Project File

**Discussion:**

The standards for waiving a left turn requirement are difficult to meet. The County has one opportunity to ensure needed facilities are installed, even though the project will exist many decades into the future. As such the findings to waive the left turn requirement are challenging. Significant hardship needs to be showed, such as the presence of important environmental resources, steep slopes, geological features or heritage trees, etc. Neither minor earthmoving, reasonable cost, nor inconvenience is a factor to be considered.

**Determination:**

I tentatively find that based on the evidence provided that the left turn lane need not be installed for this project based on items 1 through 4 listed above. The cumulative impacts as further supported by the fact that very few trips that would benefit by the installation of the left turn lane lead to the reasonable conclusion that the lane need not be installed.

This decision shall automatically become final upon the Planning Commission's final action on the underlying use permit, and this determination relies on the project's CEQA analysis. This decision may be appealed to the Board of Supervisors following the Planning Commission's decision on your project as a whole and based on the record before the Planning Commission. If you have any questions please feel free to contact me.

Sincerely,



Steven E. Lederer  
Director of Public Works

Cc: Michael Parker, Deputy Planning Director  
Trevor Hawkes, PBES Project Planner  
Laura Anderson, Deputy County Counsel  
Ahsan Kazmi, Public Works