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COMMENTS ON THE PROPOSED FARMSTEAD HOTEL

ADMINISTRATIVE PROCESS:

The time between the applicant's project presentation (July 15, 2020) and the window for public comment in addition to the difficulty in accessing the full underlying documents has been inadequate. The Governor's order that during the time of the pandemic, necessary public business may be conducted remotely, has resulted in dismal public participation both in St. Helena and Napa County. The City has not made the case that this particular project which will have a major impact on its future is urgent or necessary at this time.

GENERAL COMMENT:

If the City were to approve one hotel, it would be the one at Farmstead, because a major part of the infrastructure is already in place.

The current virus pandemic with many more to come due to globalization (according to the Smithsonian there are some 850,000 unexamined viruses around) forces us to recognize the need towards a more diversified economy. However, part of such an economy can be developed around symposia which require appropriate venues. A hotel which provides them is worth consideration.

On the negative side of this project are a number of major unresolved issues.

NUMBER OF EMPLOYEES:

The accepted employee number for luxury hotels is 2 to 2½ per room. At almost \$1,000 per night average room rates, this hotel belongs in this category. The above ratio also formed the basis for the EIR review for the Four Seasons and Calistoga Hills hotels in Calistoga.

According to this industry formula, 65 rooms will require 130 – 150 additional employees. The applicant has not provided a detailed accounting on why this hotel deviates so widely from the norm.

The employees for the current restaurant operation may not be discounted from the overall count as their number will be more than offset by full and part time employees needed for the multiple additional functions of the proposed operation.

I believe that the new employee analysis is not adequate. Each of the proposed functions' full and part time employees (consultants, providers, demonstrators, instructors, wine makers etc.) must be analyzed individually.

PARKING:

The current parking spaces even for the existing operation are inadequate. On most evenings during the past years, parking demand generated by this facility spills over on to Charter Oak Street with almost no parking left for residents and their guests.

Not only is the existing parking inadequate for the current operation but the proposed added functions and events require more on-site parking.

LEASED PARKING LOT:

The employee parking lot is leased by the applicant who states that should the lease not be renewed, he will “seek another location”. There are four problems with this proposition:

- 1) As per the above, the parking spaces provided for employees is inadequate by a factor of 40 - 50%.
- 2) The specific location of the parking lot which provides a walking option of employees to their place of employment is an integral part of the project’s traffic and environmental impacts analysis.
- 3) Any replacement site must provide the same walkability characteristics. Unless such site is identified prior to a project approval, the total project impacts are impossible to evaluate.

TRAFFIC:

Everyone who uses Hwy 29 through town, has experienced the additional delays generated by the recent traffic light at Grayson. The impacts of this traffic light were never rigorously evaluated at the time in terms of time lost, or on air quality.

In evaluating the impact of the new 4-way over the 3-way traffic light, the traffic study is only required to evaluate additional impacts on to existing conditions, meaning the ones on top of the ones before. There are two service level E conditions (ABL and NBL) and one level F (SBR) at Main Street and Grayson. And a level F (SW) at Main Street and Charter Oak.

Every citizen up and down the Napa Valley including the all-important visitors we are trying to attract, are keenly aware that traffic conditions through St. Helena are frustrating. Any addition to them in the *absence of comprehensive, structural traffic calming measures* discourage rather than encourage visitors to visit the town for a second time.

At a time when all of western Europe is replacing the defunct traffic light model with roundabouts, we are still adding them. In my opinion, *only a roundabout at the Grayson location will solve the traffic congestion both existing and amplified by this hotel.*

It has been commented that the project’s location at the south end of town gives it a traffic advantage. Visitors to the Napa Valley do not exclusively arrive from the south. Even so, they venture to the wine country to the north.

WATER:

Several comments have been made regarding the water shortages St. Helena and the entire Napa Valley. All science-backed indications are that it will get worse for many years in the future.

My comment here addresses the increased water rates.

With no changes in water demand, the water charges for the month of April for our four apartments on Edwards Street (2 studios and 2 one-bedrooms) were \$133.55 in 2015 v. \$409.55 in 2020.

Even so, in 5 short years, while rents at these apartments have increased by 15 - 20%, water rates have increased by 300%. This constitutes a disproportionate level of the total rent for the typical work force tenants. Water rates in St. Helena are in a trajectory of making even the smallest apartments unaffordable to our low-income work force.

Any increase in the demand for water increases its cost. A hotel does just that with the higher cost being borne by every resident in St. Helena who essentially subsidizes its operation.

WORK FORCE HOUSING:

The hospitality industry generates the lowest paying jobs in the entire Napa Valley, even lower than those in the wine industry which is second.

The applicant proposes to “substantially fund” work force housing. This vague component of the application is potentially the most serious one.

- 1) Presumably, only a portion of the added work force housing need of approx. 50-70 units the hotel will generate will be funded by it (whatever this number is), the residual balance will generate more commuters. I do not need to elaborate on the associated environmental impact (traffic, air quality, water).
- 2) Just as with the unknown and potentially non-existent alternate work force parking site in St. Helena, the same problem exists for the work force housing location itself.
- 3) We are all aware of how unpopular work force housing in established neighborhoods is. The single best solution has been the Solage hotel in Calistoga where the owners provided the site right adjacent (walkable) to the hotel. All other hotels made a grossly unrealistic monetary contribution towards the high construction costs, never providing a site for it. *The only realistic solution to this generic problem is for such housing to be built on-site.*
- 4) In the absence of an identified site and a realistic monetary contribution the project should not be approved.

LOCALLY OWNED AND OPERATED:

Much value has been placed on the applicant’s high personal standing and credibility in the community. True and correct as this may be, we have seen that Solage, Four Seasons, Calistoga Hills and not least Las Alcobas – every single major such development in both towns – has experienced multiple ownership changes, some almost immediately following completion or shortly thereafter.

The overwhelming evidence is that what today may be locally owned and operated, is highly unlikely to remain so even in the short future.

NEGATIVE DECLARATION:

Both the above referenced large hotel developments in Calistoga, even though they are approx. 50% larger, had the benefit of the far fewer traffic issues and adequate water availability at the time. Nevertheless, they both were evaluated by an EIR.

- We have seen how vulnerable the Las Alcobas hotel’s parking situation remains, only temporarily solved by a leased adjacent lot. No one can predict the impacts if such lease becomes unavailable in the future. *It is incumbent upon the City not to repeat the same mistake.* The impact of a provisional work force parking site when its lease becomes unavailable is likely to have substantial and unexamined environmental impacts.
- The traffic impacts - more impactful than in Calistoga’s environment - have not been fully evaluated. Even at that, the EIR of Calistoga Hills determined that its impact on the intersection of Hwy 29 and Main Street (Lincoln Avenue) was impossible to mitigate. Only an EIR identified this problem.

- The city-wide impact of the project's additional water demand and associated escalating cost as it specifically affects low wage earners and housing affordability has not been fully addressed.
- The unspecified extent of the applicant's monetary contribution to the creation of affordable housing is too vague in order to evaluate its potentially significant environmental impact.

ADDITIONAL EIR BENEFIT:

In addition to the above benefits an EIR review mandates the consideration of alternative projects. For example, the possibility of providing 15 or so work force housing units on site. The possibility of creating additional space by having a mix of one and two-story guest units.

CLOSING COMMENT:

In view of the above considerations, I believe an EIR is required so that the citizens of St. Helena become fully aware of the true impacts and associated mitigations of this project.

Three of the unresolved issues highlighted above should be considered within the specific potentially available sites in St. Helena so that the project is reviewed in its complete iteration. At this time though closely interrelated, major portions of the project once again summarized below, and their potential environmental impacts are unknown due to the vagueness of the application.

- An alternative site for the fragile relationship between the long-term availability of the leased employee parking has not been identified - nor is it likely to be – in ways which duplicate the characteristics of the proposed site, precipitating in new unexamined impacts of its own.
- The size of the on-site as well as of the employee parking is inadequate.
- The same applies to the vagueness of both the monetary contribution toward affordable housing and the availability of an available site, also with unexamined impacts of their own.
- Both these vague components have the potential to fundamentally influence the findings of the traffic study and other environmental impacts.
- The impacts introduced by a 4-way intersection of Main Street and Grayson, with the 4th leg adding substantial new traffic, especially one which is not continuous but very heavy at times – time windows which themselves remain unidentified. Such impacts in the context of both residents', drive-through business traffic, likely negative visitor experience, let alone air quality have not been evaluated.

In considering the impacts of the Calistoga Hills (and Four Seasons) hotel, the city of Calistoga had ordered an EIR which among other findings, identified that the traffic impact at the Hwy 29 and Main Street (Lincoln Avenue) intersection was *unmitigatable*. It approved this hotel anyway citing "overriding considerations". To its credit, it placed both hotels on the ballot and the citizens approved them *fully cognizant of the impacts*. At this point this is not the case with this project.

Being fully cognizant of the impacts of this project, is something the citizens of St. Helena deserve as well. Only an EIR will identify them.

