

[Re: P18-00038 Inn at the Abbey, Notice of DEIR Preparation.

Email Comment sent to Trevor Hawkes, Napa County Planning, Building, and Environmental Services Department]

Dear Mr. Hawkes,

I like to take the opportunity to insure the EIR of the subject project considers Cumulative Impacts as mandated under Other CEQA Considerations.

CUMULATIVE IMPACTS:

The CEQA Guidelines define cumulative effects as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” The CEQA Guidelines further state that the individual effects can be the various changes related to a single project or the changes involved in a number of other closely related past, present, and reasonably foreseeable future projects (Section 15335). The CEQA Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List method – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- Regional growth projections method – A summary of projects contained in an adopted general plan or related planning document or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact (Section 15130).

I like to draw your attention to:

- A current hotel application at Farmstead in St. Helena of similar scope and size as the subject.
- The Calistoga Hills Resort on Highway 29 in Calistoga currently under construction and approximately 50% larger than the subject. I would

like to point out that the EIR of this resort determined that the impacts at the intersection of Highway 29 and Lincoln Avenue in Calistoga were **not** mitigatable. The project was approved by the city of Calistoga citing “overriding considerations”. This intersection is situated only 5 miles to the north of the subject.

- The Four Seasons Resort at the Silverado Trail entry to Calistoga is also under construction and approximately 50% larger than the subject, also impacts said intersection. Per the EIR of both resorts, they will generate approximately 3,000 vehicle trips per day.
- Should the regional growth projection method be chosen, the impacts of the current application for a resort of massive proportions at the former Guenoc property in Lake County must be considered

The EIR of the Inn at the Abbey must consider the cumulative impacts as they relate to traffic and specifically through the town of St. Helena and at the Highway 29 / Lincoln Avenue intersection in Calistoga.

George Caloyannidis