

November 12, 2012

Mr. Erik V. Lundquist, Senior Planner
Planning & Building Department
City of Calistoga
1232 Washington Street
Calistoga, CA 94515

RE: Resort at Indian Springs Expansion Project
Initial Study and Mitigated Negative Declaration
October 11, 2012

Dear Erik:

Thank you for the opportunity to review the referenced document last week. After review, I would like to submit these comments for your review and analysis before the Planning Commission meeting on November 14, 2012. I'd also like you to forward these comments to the Chairman and all Members of the Planning Commission.

My initial comments include an overall opinion that it may be premature to approve the Mitigated Negative Declaration at this time. While I believe that a) the majority of the environmental impacts reviewed were appropriately identified and analyzed, and b) the recommended mitigation measures are appropriate and reasonable, there are a few areas of consideration that were not fully addressed or are not completely clear in the documents prepared by the City and the various consultants. My detailed comments follow below:

1. Section III, d): It appears to me that the evaluation of construction dust (particulate matter) generated during the construction phase of the project seems woefully underestimated (at <1 pound per hour). We're talking about a significant area of disturbance (parking lots, building pads, pathways, new roads, et al.) on a property that already has neighbors concerned about dust generated during ash/silt excavation. While I agree with the mitigation measures proposed, the evaluation of potential emissions from the project seems to significantly underestimate the impact. These comments are made recognizing that the earthmoving activities at the site may occur over a limited time period. I recommend this potential impact be further evaluated before the Mitigated Negative Declaration (MND) be approved. 1
2. Section III, e): The Initial Study (IS) failed to address a unique source of odors at the project site: sulfurous odors from the potentially increased usage of the geothermal water at the site. I suggest the analysis be updated to include this odor source. 2
3. Section IV, a) and e): The discussion/evaluation seems to ignore the historic value of the tall palm trees planted originally during the 1860 "Sam Brannan era" and now a significant tie to that historical time at the original "hot springs spa." As described in Robert Louis Stevenson's "Siverado Squatters," these now giant palms identified the locations of the original cottages and should be offered significant protection from the new project at Indian Springs. Although the "Tree Protection Plan" by Branum offers suggestions for tree protection based on type, location and condition of the existing trees to be disturbed, it does not put any of those trees in an historic context. This matter should also be addressed under Section V Cultural Resources. 3
4. Section V, a): The analysis of cultural resources seems to be limited to pre-history occupants of the region and the historical (circa 1900s) buildings at the site. I believe the original 1860s Brannan resort and the associated remaining plantings also need to be identified as a potential environmental impact and protected via mitigation measures. See comment 3 above. Perhaps this can be simply resolved with an addendum identifying which palm trees date to that period and tying it to the list of trees to be removed/replanted and associated mitigation measures. 4
5. Section IX, all subsections: This evaluation of hydrology and water quality should be expanded to address quantitatively the releases to ground/Napa River, the City of Calistoga wastewater treatment plant and reinjection to the groundwater resource. The general comments with regard to minimal additional use/releases seems not to address the reality that the property is expanding from 41 to 116 lodgings (nearly 3 times the existing use), with some associated additional use of the 5

- geothermal mineral water resources at the site (which, in fact, draws the visitors). Specifically with regard to discharges to the treatment plant, the text mentions “no discharge of geothermal water without the City Engineer’s approval”, but fails to document any current agreement to allow such discharge, or the quantities permitted. More explanation required for understanding the impacts of discharges to the ground/Napa River, the treatment plant and reinjection to the groundwater resource. Also of significance may be the current “baseline” of water use and wastewater treatment capacity consumption. No such quantification is included in the IS. For example, how can “historic flows be maintained” when storm runoff will be impacted by the addition of several hundred (if not thousands) of square feet of impervious surfaces (building roofs, asphalt paved roads and parking lots, etc.). This type of quantitative evaluation should be performed now, not in the so-called “final study”.
6. Section X, b): This section should also evaluate geothermal water management in a quantitative approach; see also comment 5. 5
 7. Section XI: In this section, regarding mineral resources, there was no discussion of the “mining” of silt/ash resources on property for spa use. It appears this activity will cease after the construction of the expansion project improvements, which may cause impacts on-site of at other off-site locations where these materials will be obtained, transported, stockpiled in the future. 6
 8. Section XII, d): Given the proximity of neighbors to the project in the mobile home park(s), I suggest that the Mitigation Measure specifying construction times (7 am to 7 pm) be modified to 8 am to 5 pm to minimize short term impacts to this sensitive population. 7
 9. Section XII, a): Given the size of the proposed project (as compared with two other recent resort development proposals recently evaluated by the Planning Commission), I was surprised at the absence of a quantitative evaluation of the number of new employees and the need for their lodging. I would have liked to see some specifics about the impact, a discussion of the pluses/minuses of actually contributing to creating new housing vs. the “housing impact fee” payment, and the calculation that lead to the “impact fee” amount. 8
 10. Sections XIV and XV: Given the comment above (9), it would seem that the project would have some impact on the need for Public Services and Recreation—that is, use of the “No Impact” option seems incorrect. Again, a more quantitative analysis would be useful. As expressed in other cases, I have a bias against paying an impact fee vs. actually doing something to help minimize the impact. 9
 11. Section XVI : I believe this section needs significant additional work, starting with the supporting documents and the choice of the “Study Area.” Limiting the Study Area to the frontage of the Indian Springs Resort along Lincoln Avenue eliminates consideration of traffic impacts to the Highway 29/Silverado Trail and Highway 29/Highway 128/Lincoln/Foothill intersections (the primary gateways to town) that can be expected to have impacts from traffic generated by this major expansion of an existing resort. Especially given the public concerns expressed over the gateway traffic impacts of similarly sized resorts at Silver Rose and Enchanted Resorts (per their EIR evaluations), it is amazing that neither of these impacts was reviewed. I see this as the strongest argument for considering the IS as incomplete, and am surprised that you haven’t had any comments from the other resort proponents arguing for a “level playing field” on this matter. In the IS, in Section XVI. a and b) writeup at the center of Page 50, the Silverado Trail/Lincoln Avenue is mentioned, but there was no corresponding discussion in the reference document (the W-Trans) Traffic Impact Studies. Much of the work addressing impacts at the two entry intersections has already been done by the proponents of the other two resorts recently approved by the City Council, and could easily have been modified/reported to include the evaluations I am requesting. The answers may have been similar to prior work (even if a cumulative analysis was done), but it needs to be addressed for public consumption. Even if 1 additional car associated with the Indian Springs expansion was added in the critical times at the corner of Lincoln & Foothill, it would be apparent that the impact is significant and there are no reasonable mitigations identified. It needs to be “spelled out” for the IS document to be complete. 10
 12. Section XVI: Although “sight distance” and “turn lane warrant” studies were performed, I am not qualified to review same. But it seems to me the “traffic calming” measures proposed are inadequate to protect drivers, pedestrians, bicycle riders, et al. near the entrances to the Resort. I live directly across Lincoln Avenue from the entrance (on Wapoo Avenue) and am continually exposed to screeching brakes, traffic traveling too fast, and pedestrian mis-adventures at and near that intersection. I strongly believe that additional mitigations should include (in order of 11
- 12

- significance): reduced speed limits into town on Lincoln Avenue starting at the intersection with Silverado trail, left turn lane for traffic from the north into the Resort, a cross-walk with flashing lights for pedestrians and bicycles to cross Lincoln Avenue at Wapoo Avenue, cross-walk with flashing lights at corner of Lincoln Avenue and Brannan Street, right turn lane into the Resort for northbound traffic on Lincoln Avenue, and eventually stop lights or signals at the intersections of Lincoln/Brannan and Lincoln/Wapoo. It's not safe now, and with expansion of the Resort will get less safe. 12
13. Section XVIII: Again, no quantitative analyses were performed to address the cumulative impact of the Indian Springs Expansion combined with the two other large resorts recently approved on water service and wastewater treatment capacities. Geothermal water disposal evaluation was not present either. Again, its very hard to see how increasing the lodging units at Indian Springs Resort from 41 to 116 (a factor of 3) will result in "no substantial increase in waste water" or a "slight domestic demand" increase. 13
14. Mandatory Findings of Significance: See prior comments (especially comments 12 & 13); at the absolute minimum, traffic at Lincoln and Foothill should be noted here (as was done for the Enchanted Forest project). 14

I also reviewed the supporting studies appended to the IS. My specific comments follow:

1. Traffic Study(ies): The September 6, 2011 and March 19, 2012 reports fail completely (by my reading) to even mention, let alone evaluate, the potentially impacted intersections of Lincoln/Foothill and Lincoln/Silverado Trail/Lake Street. Finally, in the "response letter to CalTrans", dated May 22, 2012, there is a very weak argument presented for not including these intersections. This is a major weakness of the traffic evaluation and my single largest concern about the IS and the conclusion to issue the MND. 15
2. Historic Review/Cultural Resources Report: A relatively minor (but important to me at Brannan Cottage Inn) error/incomplete documentation aspect of this report is a) the complete failure to discuss the one original Brannan cottage still remaining at it's original location (at 109 Wapoo Avenue, across from the Indian Springs Resort; Page 5) and the listing of incorrect current uses for the remaining Brannan cottages on Cedar and Wapoo (the current uses were reversed). I am the current owner of the cottage at 109 Wapoo Avenue, now the Brannan Cottage Inn Bed & Breakfast. 16

Thank you for the opportunity to provide this input, and for your consideration of these comments on the recently published Initial Study, and the resulting recommendation for a Mitigated Negative Declaration. I support the Resort at Indian Springs Expansion Project and look forward to additional opportunities to participate in the process of adequately evaluating and providing an appropriate background to approve the project and improve our community.

Sincerely,

Doug Cook
Brannan Cottage Inn