

PRESERVE LODI LANE

NEWS TO USE

The Inn at the Abbey ***(Jackson Family Real Estate, LLC.)***

STRUCTURAL GEOMETRIC HAZARDS

The construction of a 79-room boutique hotel and resort bookending Lodi Lane on SR 29 would collectively generate tens of thousands of annual vehicle trips to the development property: hotel guests, conference center attendees; restaurant, bar, pool, spa, fitness center and retail store patrons; visitors to the Freemark Abbey winery; *Vine Trail* cyclists and pedestrians; citizens using the public transit facility contiguous to the *IATA* reception/valet parking entrance/exit; thousands of *IATA* employee trips to and from work; scores of service and delivery vehicles required to minimally support a luxury boutique hotel; and hundreds of thousands of winery patrons using both SR 29 and Lodi Lane to visit wineries in immediate proximity to the development.

Cumulatively, these traffic factors constitute the exponential expansion of transparently identifiable structural geometric hazards to public health and safety and the splitting of a community that have been excluded from the to the peril of the public.

The identification of intrinsic structural geometric hazards and splitting of community was excised from the nd EIR predicated on Napa County's wholly meritless reliance on outdated, patently irrelevant traffic studies commissioned or acquired by the developer nearly two years (2017) prior to the February 2019 submission of their application for a Major Permit Modification.

STRUCTURAL GEOMETRIC HAZARDS EXCLUDED FROM THE EIR.

- I. Entering Lodi Lane from SR 29.
- II. Vine Trail.
- III. Entering Lodi Lane from North on SR 29.
- IV. Developer-Commissioned Traffic Studies.
- V. Cancellation of *Ascent Environmental* EIR Contract.

- VI. Inn at the Abbey SR 29 Traffic Study.
- VII. Ingress and Egress at the Inn at the Abbey.
- VIII. SR 29 Entrance/Exit.
- IX. Cumulative Traffic Factors at the Inn at the Abbey.
- X. Projected Inn at the Abbey Vehicle Trips.
- XI. Separation of Community.
- XII. Structural Geometric Hazards to Emergency Fire and Police Vehicles, and
- XIII. Inn at the Abbey Parking.

I. **Entering Lodi Lane from SR 29**

Both historically and currently, each time a driver needs to make a right turn north on SR 29 from Lodi Lane, they routinely nose their vehicle towards the northbound traffic lane in search of an unobstructed sightline to traffic abruptly appearing out blind curves both north and south at 50-mph. From Lodi Lane south, SR 29 slightly slopes 600 feet to a blind curve bordered by massive trees with thick foliage obscuring vehicles approaching at 50-mph together with intermittent cyclists and some pedestrians.

If the driver of a vehicle seeking to make a right-hand turn from Lodi Lane onto SR 29 occupies the striped turn lane next to a driver making the left-hand turn—also having nosed towards the northbound traffic lane—his or her vehicle will block the left-hand turn driver’s sightline to traffic approaching from the north at 50-mph, forcing them to nose further towards the traffic lane or wait until the right-hand turn driver has completed their turn. These delays also generate the physical basis for a traffic queue on Lodi Lane, which if containing more than four vehicles, will block the southern entrance to the IATA.

Both the Lodi Lane right and left-hand drivers’ sightline to southbound traffic is also blocked if more than two vehicles are queued in the SR 29 left-hand turn lane into Lodi Lane. These SR 29 left-hand turn drivers’ view behind them is impaired by an upward slope with a slight curve in the southbound lane hiding vehicles approaching at 50-mph.

When a delivery truck or van, or large wine industry truck occupies either the right or left-hand turn lane on SR 29, all passenger vehicles are commonly discouraged from nosing towards the northbound lane to obtain an unobstructed sightline, and will remain in place—again creating the basis for a vehicle queue—until the larger vehicle(s) has safely completed its turn. The length of time waiting to make a turn can result in a vehicle queue that may block the southern entrance/exit to the IATA on the north side of Lodi Lane, and impede IATA guests, visitors,

employees, and Inn service carts from crossing Lodi Lane from one side of the IATA to the other.

At the same time the vehicle posed to make a left-hand turn onto SR 29 is blocking the sightline of the driver next to them making a right-hand turn, the vehicle of the driver making the right-hand turn also blocks the sightline of the driver making the left-hand turn. Both Lodi Lane drivers' sightlines are compromised further by vehicles queued in the SR 29 left-hand turn lane into Lodi Lane preventing an unobstructed view of southbound traffic approaching at 50-mph from a curve on an upward slope north.

II. VINE TRAIL

The construction of the cyclist and pedestrian *Vine Trail* contiguous on SR 29 from St. Helena to Calistoga has been funded by Napa County and will contiguously front *IATA* on both its north and south construction sites and Lodi Lane tee-intersection. When the *Vine Trail* is operative, drivers using Lodi Lane to turn left or right onto SR 29, both having nosed into the SR 29 traffic lane in search of uncompromised sightlines, will physically impede the passage of *Vine Trail* cyclists and pedestrians—including *IATA* guests, visitors, employees, and guest service carts—either forcing them to stop, or negotiate passage in front of the vehicle nosed into the SR 29 northbound traffic lane, or equally dangerously, between queued vehicles.

III. ENTERING LODI LANE FROM NORTH ON SR 29

Aggravating existing structural geometric hazards at the tee-intersection of Lodi Lane and SR 29, is the location of the southbound left-hand turn lane from SR 29 onto Lodi Lane. Routinely, southbound drivers, when making their left-hand turn onto Lodi Lane, nose forward and block all vehicles turning left onto SR 29. If there is more than one vehicle in the SR 29 left-hand turn queue, the next vehicle quickly replaces the vehicle that turned left onto Lodi Lane again blocking a left-turn south onto SR 29 and the likelihood of increasing the number of vehicles in both turn queues onto SR 29.

Once the *Vine Trail* is operative, all drivers turning left from SR 29 onto Lodi Lane, whenever a cyclist or pedestrian—including Inn guests, visitors, employees, and guest service carts—approaches or occupies the tee-intersection at Lodi Lane, they will be forced to either delay their turn or recklessly scoot past the cyclist(s) or pedestrian(s) using the trail. This constitutes a material structural geometric hazard to public health and safety.

First-time visitor drivers turning left onto Lodi Lane from the southbound left-hand turn lane on SR 29 will unlikely have a working knowledge of the *Vine Trail*, either because they are simply unaware of its existence, or more realistically, because approaching cyclists and pedestrians can be concealed by vehicles traveling north on SR 29. This dangerous visual impairment constitutes a structural geometric hazard to public health and safety.

IV. DEVELOPER-COMMISSIONED AND ACQUIRED TRAFFIC STUDIES

The Napa County *IATA* NOP relies exclusively on developer-commissioned and acquired traffic studies to validate the unverifiable assertion—because the studies are nearly five years old—that the development would have an “acceptable” impact on traffic with no mitigation other than striping the left and right-hand turn lanes at the tee-intersection of SR 29 and Lodi Lane.

The traffic studies were completed approximately two years prior to the submission of the *IATA* Major Permit Modification application dated February 2019, and constitute the sole basis for the exclusion of structural geometric hazards from the Napa County NOP and, therefore, the exclusion of public opinion from consideration in the EIR.

1. Collision Study (2012-2016)
2. Level of Service (LOS) (2017)
3. SR 29 Traffic Volume at Lodi Lane (2017), and
4. Vehicle Trips to Existing Winery and Restaurant (2017).

The *IATA* developer-commissioned study of vehicle trips determined that there were 366 daylight trips to Freemark Abbey property at the development site during the February and December 2017 daylight vehicle counts, and posited (without disclosure of its basis), that *IATA* would generate an additional 645 additional guest trips per day. Employee and service and delivery vehicle counts were not performed and thus not separately identified in the daylight traffic studies.

Based on these 2017 developer-commissioned and acquired counts and projections, some 398,215 annual trips would be made to the *IATA* property.

These traffic studies were relied upon by the terminated EIR contractor and the Napa County Planning, Building, and Environmental Services department as sole justification for excluding a structural geometric traffic hazards analyses from the *IATA NOP*, its EIR, and therefore, lawful public commentary. It will years since the completion of these studies and possess no current-day probative value in ascertaining the structural geometric hazards, traffic loads, parking, splitting a community, and other health and safety issues embodied in the location of the *IATA* at the tee-intersection of SR 29 and Lodi Lane.

the *IATA EIR* thus illegally excluding consideration of public commentary.

V. INN AT THE ABBEY SR 29 TRAFFIC STUDY

The SR 29 and Lodi Lane traffic study commissioned by *IATA* developers nearly seven-years-ago ascertained that 15,000 vehicles pass Lodi Lane on SR 29 each weekday, and 13,000 on week-end days or 4,848,000 vehicles annually. 2017 projected annual traffic on Lodi Lane, 350,400.

Combined projected SR 29/Lodi Lane Annual Vehicle Total: 5,198,400.

Predicated on its *IATA* 2017 traffic count and designation of all structural geometric hazards to be of “less significance,” *Ascent Environmental* and Napa County NOP concluded:

“Upon the addition of project-related traffic to existing volumes, both study intersections (Lodi Lane at both SR 29 and Silverado Trail) would be expected to continue to operate acceptably at the same level as existing traffic. Further, the delays would be less than significant than those under Permitted Conditions and a traffic light would not be warranted.”

Striping separate left and right-hand turn lanes (Lodi Lane at SR 29), would reduce conditions to “less than significant.”

VI. INGRESS AND EGRESS AT THE *INN AT THE ABBEY*

The SR 29 entrance/exit to the *IATA* reception/valet parking area is restricted to guest vehicles traveling north on SR 29, and is located on the north boundary of a public transit stop which, if a transit bus occupies the space, impairs the view of the Inn reception/valet parking entrance/exit, and forces guests to negotiate past it to identify and thus utilize it.

The unexpected blockage of the sightline to the unfamiliar reception/valet parking entrance/exit by transit buses will result in guests slowing, forcing vehicles behind them on SR 29 to also slow or stop if they unexpectedly stop.

Guests missing the entrance/exit entirely will be forced drive north a quarter of a mile on SR 29 to find and use the driveway of a winery for a safe U-turn to return south to the *IATA*. Guests unfamiliar with SR 29 immediately north of the proposed development may try to use the narrow driveway of the Trinchero Family winery, or the tee-intersection at Elhers Lane with a blind curve north of it, to negotiate a dangerous U-turn required to return south to *IATA* to check in.

Because there is no southbound left-hand turn lane on SR 29 to facilitate the crossing of the northbound traffic lane into the *IATA* reception/valet parking area because of the downwardly sloped blind curve just 500 feet north, guests will be forced south to queue in the Lodi Lane left-hand turn lane to access the Inn either at its southern entrance/exit on Lodi Lane, or execute a U-turn to return north on SR 29 to access the entrance/exit to both check in and utilize valet parking.

Once on Lodi Lane, guests will have to turn immediately left at the southern entrance/exit to the Inn on Lodi Lane, or if blocked by a queue of vehicles occupying either the striped right or left-hand turn lanes onto SR 29, to make another U-turn, then a right turn on SR 29 to access the right-hand-only reception/valet parking entrance/exit. Lodi Lane guest vehicle maneuvers

will be compromised by vehicle queues, and by guests, visitors, employees, and service carts crossing from one side of IATA to the other day and night constituting a structural geometric hazard to public health and safety.

Because the *Vine Trail* cyclist and pedestrian path is contiguous to the IATA sites on both sides of Lodi Lane and the Lodi Lane SR 29 tee-intersection, guests desiring to either turn right or left onto Lodi Lane or access the reception/valet parking area, will be forced to stop in the northbound SR 29 traffic lane and the southbound SR 29 left-hand turn lane to Lodi Lane to permit cyclists and pedestrians to safely pass. This random stoppage impeding both northbound and southbound traffic constitutes a structural geometric hazard.

VIII. SR 29 ENTRANCE/EXIT

Guests utilizing the reception/valet parking entrance to exit onto SR 29 must turn northbound on SR 29 whether or not they need or desire to travel south. They must travel a quarter mile north to the winery restaurant driveway—or tempted by the Trinchero Family winery driveway or the Elhers Lane tee-intersection for a dangerous U-turn to enable them to safely proceed south on SR 29.

Guests using the reception/valet parking entrance as an exit will be prohibited from turning left across the northbound traffic lane not only because of vehicles traveling both north and south at 50-mph past the Inn, but even more hazardously, because SR 29 north hidden by downward slope some 500 feet from the Inn SR 29 entrance/exit, obstructs physical awareness of southbound vehicles approaching at 50-mph.

Departing Inn guests desiring to travel south on SR 29 who don't wish to turn right on SR 29 at the reception entrance/exit and then find a safe place to make a U-turn, will be forced to use a two-way driveway parallel to SR 29 on the Inn site to access the southern Inn entrance/exit on Lodi Lane. Because this entrance/exit from the Inn is only 75 feet from SR 29 at the foot of both the left and right-hand striped turn lanes, any more than three vehicles in either the left or right-hand turn queue lanes, will prevent exiting Inn guests seeking to enter either the left or right-hand turn lane for SR 29 until the turn lane queues clear.

NOTE: This calculation is based on an average 14-foot vehicle length (ranging from 14 for a small SUV and 17 feet for a standard pick-up truck. Larger trucks and delivery vehicle percentages will be required to be calculated with an actual vehicle count), with the addition of an average space of 4 feet between vehicles in a queue, for a total of 18 feet. Four vehicles in either the left or right-hand turn lanes will block the southern IATA entrance on Lodi Lane.

This blocked access will also block all other guest vehicles behind them from exiting further impeding of guest, visitor, employee, and service carts crossing from one side of IATA to the other on Lodi Lane.

All southbound *IATA* guests on SR 29 will pass the reception/valet parking entrance/exit on their left and must queue at the SR 29 left-hand turn lane at Lodi Lane. Any guest who decides to turn left—upon spotting the reception/valet parking entrance/exit— from southbound SR 29 across the northbound lane because they credibly believe it’s the reception entrance to the Inn—will stop some 500 feet from the crest of the southbound downward slope hiding approaching traffic constituting a structural geometric hazard to public health and safety.

Southbound SR 29 *IATA* guests passing the reception/valet parking entrance/exit on their left must use a left-hand turn lane into Lodi Lane on a downward slope to access the hotel. If any more than four cars are queued in this left turn lane, the fifth and all subsequent vehicles will force southbound traffic to stop with no room to pass vehicles in the queue due to a 12-foot-wide lane with a contiguous bike path constituting a structural geometric hazard to public health and safety.

Drivers turning left onto Lodi Lane from SR 29 must negotiate the turn mindful of striped left and right-hand turn lanes containing a maximum of three cars in each queue. The addition of other vehicles will extend the turn queues in single files east on Lodi Lane. All other drivers seeking turn either left or right onto SR 29. Once the queue is filled, all vehicles will be forced into a single queue on Lodi Lane blocking both left and right-hand turns into the Inn at the Abbey, and entering or exiting the Inn at the entrance on Lodi Lane, and impeding guest, visitor, employee and service cart crossings constituting a structural geometric hazard to public health and safety.

If the left and right-hand turn lanes onto SR 29 contain more than four cars in a queue, they will block the Lodi Lane entrance into and exit from *IATA*. This blockage will not only impede vehicles having turned left onto Lodi Lane from SR 29, but those turning right onto Lodi Lane headed north on SR 29, but will additionally impede guest, visitor, employee, and service cart crossings and constituting a structural geometric hazard to public health and safety.

If more than three cars intending to turn left into the southern entrance to the *IATA* from SR 29 occupy the distance between SR 29 and the southern hotel entrance on Lodi Lane, they will also block cyclists and pedestrians on the contiguous Vine Trail, and with a longer queue, block SR 29. Inevitably, cyclists and pedestrians will negotiate passage around the front of the vehicle nosed into the northbound lane of SR 29, hazardously entering further into the 50-mph northbound lane to get around the vehicle, or dangerously between vehicles queued to turn left or right constituting a structural geometric hazard to public health and safety.

Drivers turning left from SR 29 into Lodi Lane with the intent to use the reception/valet parking entrance/exit on SR 29, will be forced to use the five-space parking area on the portion of the *IATA* fronting Lodi Lane on the south—impeded by vehicles queued to turn left into the southern entrance/exit, plus guest, visitor, employee. and service cart crossings—to accomplish a U-turn, or proceed down the 30-foot-wide rural Lodi Lane to access one of a few isolated residential driveways, or both scarce and impossibly narrow shoulders on private land to negotiate a U-Turn while mindful of vehicles observing the Lodi Lane 45-mph speed limit.

Lodi Lane is a rural road absent streetlights, and hotel guests and visitors negotiating a U-turn at night must do so in pitch dark. This constitutes structural geometric hazard to public health and safety.

IX. CUMULATIVE TRAFFIC FACTORS AT THE *INN AT THE ABBEY*

All *IATA* guests occupying the 29 rooms fronting Lodi Lane on the south will cross Lodi Lane on foot or in service vehicles day and night 365 days a year to get to and from their rooms and access amenities, and will halt all traffic on Lodi Lane each time they do so. Once occupying their rooms, guests must cross Lodi Lane on foot or in a hotel service cart to access the restaurant—at least twice a day for breakfast and dinner—use the pool and spa, enjoy the bar and rooftop terrace, retrieve their vehicles to tour and wine taste, cumulatively resulting in hundreds of crossings day and night and constituting a structural geometric hazard to public health and safety.

The 24-hour-a-day guest and visitor pedestrian load on Lodi Lane is compounded by Inn employee night and day crossings on foot or in service carts, and will require, to ensure the health and safety of guests, visitors and employees, substantial nighttime illumination, particularly because of the structural geometric hazard manifested by a posted 45-mph speed limit.

IATA development plan contains one crosswalk 150 feet east of SR 29 on Lodi Lane with warning lights embedded in the roadway in contradiction to the findings and recommendations of the Inn at the Abbey traffic study consultant:

“Pedestrian network is lacking, thought such additions (sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extension, lighting, benches), would not be appropriate.”

The proposed crosswalk only 150 feet from SR 29 will force all cars either turning right or left onto Lodi Lane from SR 29 to stop. Any more than five cars will extend the stopped queue into the SR 29 north-bound traffic lane stopping both traffic and those using the Vine Trail, thus constituting a structural geometric hazard to public health and safety.

X. PROJECTED *INN AT THE ABBEY* VEHICLE TRIPS

Most boutique luxury hotels in Napa County require a two-night minimum. In addition to initial guest arrival and departure, virtually all guests will leave and return in their vehicles each day of their stay to tour and wine taste. These activities constitute a minimum of 6 trips per guest per stay. Napa County boutique hotels boast a 70 percent occupancy rate, and thus tens of thousands of guests will be accommodated annually in the *IATA*'s 79 rooms.

To the *IATA* guest count is added the average 2.5 employees per room at boutique hotels—times 79 luxury rooms—or 198 employees together with vehicles requiring reserved parking

places. The minimum maintenance and service at a luxury hotel will also generate ongoing trips across Lodi Lane from the main part of the Inn at the Abbey to service guests occupying the 29 rooms on Lodi Lane day and night 365 days a year compounding the already dangerous structural geometric hazards on Lodi Lane. Supplies and services demanded with the management of premier lodging at a boutique resort hotel will create a steady stream of service and delivery vehicles materially contributing to the structural geometric hazard of congestion on both SR 29 and Lodi Lane.

Added to the cumulative total of trips arising from activities generated solely by the hotel is the traffic load generated by scores of wineries in immediate proximity to, or north of the Inn at the Abbey. Two major contributors to congestion are Duckhorn Winery on Lodi Lane at the Silverado Trail with recently approved annual visitations numbering over 90,000, and Rombauer Winery, a few miles north of Lodi Lane on Silverado Trail, approved for over 100,000 visitors.

Within a half mile of the proposed *Inn at the Abbey* are Brasswood, Trincherro Family, Cairdean Estate, Elhers, Allora, Ballentine, Markham, Grace Family, Faust, Ravana, Titus, William Cole, Vineyard 29, and Charles Krug wineries virtually of whom have either applied for or been approved for increased levels of production (requiring additional employees), and number of wine tasting visitations requiring physical expansion of existing facilities using the service entrance accessed off Lodi Lane.

The cumulative effect of these increases, despite being required to be included as part of any *EIR*, were excluded in the *IATA NOP* although it unambiguously constitutes a structural geometric hazard to public health and safety.

XI. SPLITTING THE COMMUNITY

SR 29 has been designated as a scenic highway by the City of St. Helena, and the tee-intersection at Lodi Lane defined as “rural.” The mountains on each side clustered with Douglas Fir and Redwood trees (many victims of the October 2020 Glass wildfire). Napa Valley narrows here, opening again less than a mile north to expansive valleys with hundreds of thousands of grape vines.

The construction of a 45-foot high—on a hill rising well above the valley floor—79-room hotel and resort with a roof deck on both sides of Lodi Lane will be required to be illuminated, particularly on Lodi Lane with scores of guests and employees crossing on foot or service carts both day and night, will bifurcate the rural agricultural neighborhood and generate thousands upon thousands of guests, visitors, and employees exponentially outnumbering local residents. Because the “splitting of the community” was excluded from the *Inn at the Abbey NOP*, no member of the local community can have their opinions about the impact of such a project considered in the *EIR*, denying their lawful involvement in a *CEQA EIR*.

XII. STRUCTUAL GEOMETRIC HAZARDS TO EMERGENCY FIRE AND POLICE VEHICLES

The congestion hazard resulting from the entrance/exit design of the *IATA* on both sides of Lodi Lane, will impede police and fire vehicles responding to emergencies. Inn guests, visitors, employees, and delivery and service vehicles may be queued on both sides of the street impeded by guests, visitors, employees, and service vehicles crossing from one side of the hotel to the other day and night. On SR 29 where northbound vehicles are queued from Lodi Lane back on SR 29 because of the pedestrian and employee crossing 150 feet east; cars queued to turn left or right onto SR 29; and cars queued in the SR 29 left-hand turn lane into Lodi Lane.

These structural geometric hazards that impede the passage of fire and police vehicles during emergencies constitute a material threat to public health and safety.

XIII. INN AT THE ABBEY PARKING

With a 70 percent occupancy rate at boutique hotels in Napa Valley, the *IATA* would host some 40,000 visitors a year or 109 a day filling 54 rooms, and assuming two persons to a vehicle, will need a minimum of 27 parking places daily. To the number of guest parking places are added the developer-projected 366 daily visitors requiring 183 parking places, and 198 employees (2.5 per room), requiring at least 99 reserved parking places (day and night), for a total of 309. The *IATA* hotel design specifies 203 parking places, some 106 spaces short of what it minimally needs to meet the parking requirements of projected guests, visitors, and employees.

SAMPLE STRUCTURAL GEOMETRIC HAZARDS

Readily confirmable structural geometric hazards and splitting of community threatening public health and safety on or near the tee-intersection of SR 29 and Lodi Lane bookended by the *IATA* development will not be included in its EIR.

1. Two 12-foot-wide SR 29 50-mph travel lanes with contiguous bike paths north and south crossing the Lodi Lane tee-intersection.
2. SR 29 north and south slopes on blind curves—approximately 600 feet south of Lodi Lane and 500 feet north of the *IATA* reception/valet parking entrance/exit.
3. An unsignalized tee-intersection at SR 29 at Lodi Lane subject to substantial increases in vehicular, cyclist and pedestrian, service and delivery vehicles, and public transit traffic due to Lodi Lane physically bifurcating two sections of the *IATA* projected to generate tens of thousands of boutique hotel guests, visitors, employees, and service and delivery vehicles annually.
4. Striped left and right-hand turn lanes onto SR 29 at Lodi Lane that when occupied contemporaneously, physically compromise driver sightlines both north and south.

5. Drivers forced to make U-turns on Lodi Lane to access hotel vehicle entrances while avoiding traffic observing its 45-mph speed limit, and while doing so at night, maneuver in pitch darkness.
6. Drivers turning both left and right onto SR 29 dangerously nose vehicles into the northbound traffic lane in a search for unimpaired sightlines.
7. Right-turn only SR 29 entrance/exit to reception/ valet parking area immediately adjacent to a public transit bus stop that if occupied, impedes the view of northbound guests forcing them to reduce speed or unexpectedly stop blocking all vehicles behind them on SR 29.
8. Guests exiting onto Northbound SR 29 must turn right, travel north nearly a quarter mile to make a safe U-turn off the highway to enable them to travel south, and then safely enter SR 29 south mindful of southbound 50-mph traffic emerging from a thickly tree-lined blind curve.
9. Guests exiting onto SR 29 who do not wish to turn right and make a U-turn to travel south may be inclined to attempt to turn left across oncoming traffic approaching at 50 mph north, and traffic going 50 mph hidden below the crest of a downward slope going south.
10. First-time guests approaching the Inn at the Abbey from the north at 50 mph who spot the reception/valet parking area and, if there is an absence of northbound traffic, will inevitably scoot recklessly across the northbound lane into the entrance/exit.
11. First-time guests approaching the Inn from the north at 50 mph who spot the reception and parking area, dangerously believing they must stop to turn left because of approaching northbound traffic, block all traffic behind them and creating a hazardous condition for a collision.
12. If more than one vehicle enters the SR 29 reception/valet parking area at the same may create a queue extending onto the northbound traffic lane forcing all approaching vehicles to stop.
13. The drivers of all vehicles intending to use the SR 29 entrance exit will be required to stop for any cyclist or pedestrian using the Vine Trail because it is contiguous to boundary of the Inn at the Abbey, thus blocking northbound traffic.
14. All drivers turning right onto SR 29 who intend to travel south are required to travel north and find a safe place to make a U-turn and then enter the traffic lane south. All drivers making U-turns are susceptible to being struck by vehicles traveling southbound at 50-mph emerging from a tree-lined blind curve.

15. A public transit stop on SR 29 contiguous to the vehicle entrance/exit to the *Inn at the Abbey* hotel reception/valet parking area that, if containing a transit bus, blocks the view of the entrance/exit for guests, visitors, cyclists, pedestrians, and all vehicles traveling north dangerously resulting in vehicle slow-downs and even stoppage, blocking all northbound traffic.
16. A public transit stop across SR 29 parallel to the *Inn at the Abbey* absent a crosswalk for guests, employees, or visitors, thus endangering their lives by being forced to cross a two-lane state highway 24 foot wide with a 50-mph speed limit, and a blind curve 500 feet north at the crest of a slope hiding approaching vehicles. Given the proximity to the blind curve and speed limit, a public transit crosswalk across SR 29 will likely never be approved.
17. The *Vine Trail* for cyclists and pedestrians contiguous with SR 29 and Inn entrances including the Lodi Lane tee-intersection requires all vehicles to give way if the trail is being utilized either across Lodi Lane or the Inn entrance/exit directly off SR 29. Cyclist and pedestrian presence will be hidden by vehicles queued to turn left or right onto SR 29 at Lodi Lane, vehicles turning left onto Lodi Lane from SR 29, and transit buses occupying the transit stop next to the Inn at the Abbey reception and valet parking entrance/exit on SR 29, collectively constituting a structural geometric hazard to public health and safety.
18. Hundreds of *Inn at the Abbey* guests, visitors, and employees crossing back and forth on Lodi Lane day and night 365 days a year either on foot or in service vehicles to access the Inn restaurant, bar, winery, conference rooms, retail stores, pool, spa, and parking, and to service guests occupying the 29 rooms fronting Lodi Lane.
19. Substantial increases in traffic in immediate proximity to the tee-intersection at Lodi Lane and SR 29 due to ongoing County of Napa-approved increases in wine production requiring additional employees, and exponential increases in approved numbers of winery visitors in immediate proximity to the *IATA*.
20. Structural attenuation in Inn construction related to lack of skilled workers virtually all of whom commute from outside Napa County, delays in obtaining construction materials due to shortages and supply line delays arising from Covid-19 that will predictably leave the *Inn at the Abbey* construction site an open sore at rural Lodi Lane at SR 29. A current example of such expected delay is the five-year length of the construction of the Four Seasons hotel and residence project on Silverado Trail in Calistoga. Local competition for skilled workers will be generated because of the construction of the 67 room Farmstead Hotel in St. Helena, and ongoing new and unmet construction demands resulting from catastrophic wildfires.
21. A catastrophic shortage \ *IATA* parking spaces—only 203—for an estimated 40,000 guests annually (70 percent occupancy in 79 rooms); 198 employees (2.5 per 79

boutique hotel rooms); daily visitors to wine tasting, restaurant, bar, rooftop lounge, spa, and retail stores with no authorized parking on SR 29, and no public land on which to park on Lodi Lane.

22. Additional traffic congestion from thousands of Wine Country Inn guests, a single private residence away from the *IATA* on Lodi Lane.
23. High numbers of service and delivery vehicles necessary to appropriately service a boutique hotel entering and exiting the property both day and night, with their often-sheer size impairing other drivers' sightlines when seeking to turn left or right from Lodi Lane onto SR 29.
24. Large numbers of guest service vehicles necessary to ferry them and their luggage from the reception area to rooms south of Lodi Lane.