

Table 1
Draft Initial Study - Red Flag Comments from Carolyn Chambers
Scope of Proposed Project

Item	Type of Building	Sq Ft	Units	Capacity (max people)	Wood burning Fireplaces	Comments
<p>It appears that 69 buildings are to be built in Lemmon Canyon, accommodating at least 716 people in buildings, tents and RV trailers. There will be parking for 400 cars. There will be 123 wood burning fireplaces, adding to the pollution problem in the valley. There will be 10,185 sq ft of Conference Room space. There will be employee housing. This development is much too large. It needs to be dramatically reduced and right-sized.</p>						
1.1	Conference Center 1	3,800	1	60		The plans call this 3,600 sq ft building a "Remote Workshop" - see Page 18. This is mis-leading because it is actually a conference room or meeting facility. Please provide its capacity. I estimated 60 people. How many parking spaces will be provided?
1.2	Conference Center 2	1,000	1	20		The plans call this 1,000 sq ft building a "Small Workshop" - see Page 18. This is mis-leading because it is actually a conference room or meeting facility. Please provide its capacity. I estimated 20 people. How many parking spaces will be provided?
1.3	Conference Center 3	1,620	1	80		Please provide the max capacity and parking spaces for this 1,620 sq ft building

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1.4	Conference Center 4	2,200	1	30		The plans call this 2,200 sq ft building a "Multiuse Building" - see Page 18. This is mis-leading because it is actually a conference room or meeting facility. Please provide its capacity. I estimated 30 people. How many parking spaces will be provided?
1.5	Dormitory for Conference Center 4	tbd	1	10		Please provide the square footage of the dormitory building (s) and max occupancy and parking spaces.. I estimated 10 people.
1.6	Classroom	1,565	1			This 1,565 sq ft building is the 5th meeting facility/ conference room planned. What is its capacity and the number of parking spaces provided
1.7	Restaurant with 12 parking spots	4,400	1	60		12 parking spaces for up to 60 diners - that is clearly inadequate
1.8	Patio dining for 40 people with no parking		1	40		No parking spaces for up to 40 patio diners - that is clearly inadequate
1.9	Large Cabins (3,200 sq ft each)	3,200	8	12	8	What is the max occupancy of each 3,200 sq foot cabin? I estimated 12. Therefore total of 96 people.

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1.10	Small Cabins (1,400 sq ft)	1,400	3	6	3	What is the max occupancy of each cabin? I estimated 6. Therefore total of 18 people
1.11	60 unit Multi-story Lodge	35,600	1	120+	60	60 rooms with 60 wood-burning fireplaces. The current lodge has 5 rooms. Surely a lodge sized at 20 rooms would be much more reasonable? Wood burning fireplaces should NOT be allowed. Smoke from wood burning fires causes PM2.5 levels to rise and Sierra County is already out of compliance with all Federal Air Quality standards, including the PM2.5 standard. Sierra County cannot absorb 123 new wood burning fireplaces, even if they are EPA certified - they STILL pollute the air and cause potentially deadly PM 2.5 particles to increase to unhealthy levels in this valley.

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1.12	Employee Housing - Management (single family homes)		2	4	2	What is the maximum capacity of these homes. I assumed 4 people per home. Wood burning fireplaces should NOT be allowed. Sierra County is already out of compliance with Federal Air Quality Standards, including the PM2.5 produced by wood burning fireplaces. My comments for item 1.11 are valid here also.
1.13	Employee Housing		40	48	40	Each of these 40 rooms will have its own wood burning fireplace. Therefore 40 new sources of wood smoke pollution in Sierraville. Wood burning fireplaces should NOT be allowed. Sierra County is already out of compliance with Federal Air Quality Standards, including the PM2.5 produced by wood burning fireplaces. My comments for item 1.11 are valid here also.

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1.14	Campground for 150+ people in tents and RVs with 44 to 48 parking spaces	7900	50+	150 in tents plus 36 in 12 RVs?		<p>This camp-ground and RV (trailer) park would be located on a 7.5 acre site encircling "Sensitive" habitat and adjacent to wetlands. It will be visible from Lemmon Canyon Rd and SR49, being only partially screened due to fire considerations. A tent and trailer park ghetto for 150+ people cannot be allowed and especially not in this sensitive area when the applicant has 635 acres from which to find a better location. Loyaltan just got rid of its unsightly trailer park after years of trying. It is inappropriate to put a year-round tent and trailer park of this size in Lemmon Canyon. How many barbecue pits will be provided? These produce just as much pollution as wood burning fireplaces thus contributing to the Air Quality problem in Sierra Valley. Outdoor cooking should not be allowed.</p>

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1.15	Shower Building for the Camping Compound	580	1		n/a	Is this building also part of the 7.5 acre Camping & RV site encircling "Sensitive" habitat and adjacent to wetlands? What is the proposed number of shower stalls for 150+ people in the campground?
1.16	Restroom Building for 150 campers		1		n/a	Is this building in the 7.5 acre Camping & RV site encircling "Sensitive" habitat and adjacent to wetlands. What is the proposed number of bathroom stalls for 150+ people living in the campground?
1.17	Open Air cooking and picnic area for Camping Compound					Is this area in the 7.5 acre Camping & RV site encircling "Sensitive" habitat and adjacent to wetlands. With 150+ campers engaging in open air cooking, that poses a serious fire hazard. It also increases the Air Quality Problem in Sierra Valley. See Item 1.11 for my comments on Air Quality.
1.18	Market/Deli for CampGround Compound	700	1		n/a	The plan calls for this market to be built adjacent to a beautiful meadow. Why? Surely it would make more sense to build a market in downtown Sierraville?

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1.19	Communal Kitchen for Campground guests	1780	1		n/a	The plan calls for this kitchen facility to be built adjacent to a beautiful meadow. Why? What about trash?
1.20	Admin offices and reception Area for entire Compound	1000	1			The plan calls for this to be built adjacent to a beautiful meadow. Why?
1.21	Changing Rooms	400	1	tbd	n/a	What is the occupancy of the changing rooms?
1.22	Maintenance Shop & Shed	4000	2	n/a	n/a	An unsightly maintenance shop and shed will be built. 2 buildings
1.23	Yard & Parking for Maintenance Shop	tbd	n/a	n/a	n/a	What size is this? How will heavy equipment be screened?
1.24	Parking area 1 - 200 vehicles on 2 acres		1	n/a	n/a	All parking areas must be paved to reduce air pollution before construction begins. Sierra County is already out of compliance with ALL Federal Air Quality standards except for two. Dust from gravel roads and parking lots will increase deadly PM2.5 to unhealthy levels.
1.25	Parking area 2 200 vehicles on 2 acres		1	n/a	n/a	See Item 1.24 - for my comment
	Totals (estimate)	98,000	69	716+	123	69 buildings with 123 wood-burning fireplaces

Table 2
Draft Initial Study - Red Flag Comments from Carolyn Chambers
General Items

	Red Flag Issue	Page Number	Carolyn Chambers' Comments
2.1	An unspecified number of new propane tanks would be located within the Compound to serve the needs of the community	Page 28	The Applicant must cover the cost of running underground natural gas lines to the project so that above ground propane tanks are not required. Propane Tanks are a major contributor to wild-fires (see the recent Camp Fire in Yuba County)
2.2	Under the proposed plan, the top priority for development is the 7.5 acre 50+ unit campground (tent city) and an RV park (trailer park) for 150+ people	see Table 3 on Page 29	The applicant has a 635 acre site. From an environmental and biological perspective it make no sense to locate this campground adjacent to sensitive wetlands and encircling an area designated as "Sentitive Habitat". Applicant should relocate it.
2.3	Under the proposed plan, the applicant has sole discretion in determining the sequence of the buildout.	page 29: Project Buildout paragraph	Under the proposed plan no formal project phasing is identified for buildout of the Masterplan". Why? Surely it would make sense to agree on a build-out plan?
2.4	Under the proposed plan the max population of this resort is expected to be 529 people - an increase of 34% over today's population.	page 31: Use Assumptions	Taking into consideration the capacity of proposed conference rooms, campgrounds, the trailer park for RVs, the restaurant, the hotel and cabins, I calculate that the maximum population could be at least 716 people. Where will they park and what about the traffic coming through Sierraville? The proposed development is much too big and should be right-sized.

Table 2
Draft Initial Study - Red Flag Comments from Carolyn Chambers
General Items

	Red Flag Issue	Page Number	Carolyn Chambers' Comments
2.5	The applicant is asking Sierra County to grant 1) a zoning change 2) a Conditional Use Permit and 3) a 20+ year Development Agreement with the option to extend beyond 20 years in 5 year increments.	Page 32 and pages iv and v	See also my comments in Table 5. The Re-Zoning Amendment, if approved, will allow the applicant to build on land currently zoned as General Forest (GF) and Agricultural (A-1). The Applicant seeks to rezone their land to PD_SP so they have the power to change the land use at a future date, via a series of amendments to the 20+ year Development Agreement that the Applicant wants Sierra County officials to approve. Surely this implies that today, the community of Sierraville and the County don't actually have a clear understanding of what the Applicant is planning to do over the next 20+ years. This calls into question the relevance of the plan that the community of Sierraville has been asked to comment on.
2.6	The County identifies 32 potentially significant environment issues affecting Lemmon Valley and Sierra County. The County claims that ALL such issues are actually "insignificant" due to mitigations	Page 34, 35	Could it be that experts in these areas and hundreds of Sierra Valley residents do not agree with the County's assertion that it is OK to downgrade all 32 issues to "insignificant"? Please provide the science and factual data that you used to determine that the impact was "insignificant" when all issues were originally found to be "potentially significant" to Sierra Valley and Lemmon Canyon.
2.7	County headcount and expertise to manage and oversee a project of this size and scope		Sierra County is one of the poorest counties in California. I worry about the impact of this project on the County's limited budget. Given the size, scope, complexity, the environmental issues and the proposed 20 year duration of this project, surely the County would need to hire a significant number of people to manage it, oversee compliance and enforce remediation of out-of-compliance events? I think that the County will need to hire at least 10 people to supervise this project. I think that the Applicant should cover the cost rather than Sierra County tax-payers. Note that the Applicant is a tax-exempt 501 (3) (c) organization. Check IRS.gov for information on tax exemptions. What is the County's staffing plans and budget for this project and how is it funded?

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2.8	60% of this 65 acre development (i.e. 39 acres) will be located within a mixed conifer woodland, thus requiring felling of numerous trees of varying sizes	Page 53 - 54	The applicant owns 635 acres of land. Therefore the applicant can move the project to another area of the property away from woodlands that are known to provide habitat to numerous species of bats and endangered birds
2.9	Paving would be “at the discretion of the applicant”	page 30 paragraph 2 Page 100	Why? Surely paving should be a requirement to reduce/mitigate air pollution (PM 2.5) from gravel road dust and noise from 500+ vehicles driving along a gravel road? The report states that the gravel road is already almost at capacity with 270 daily roundtrips. 300 daily round trips is the maximum. This project expects 1875 trips. Page 98
2.10	Construction will occur all year long for up to 11 hours a day, 7 days a week and for 20+ years.	Page 31 : Construction schedule	How could any community tolerate this? We cannot. 5 days a week from 8 a.m. to 6 p.m. is consistent with how other communities handle these things.
2.11	Grading and earthwork would primarily occur Summer through Fall, although would not be limited to those months. Such work would be allowed up to 11 hours a day, 7 days a week		<u>Require</u> that such work is limited to Summer and Fall. Define which months in the Master Plan. A compliance plan ought to be put in place with a system of substantial fines for all out of compliance events. Again, 11 hours a day, 7 days a week for 20+ years is not acceptable.
2.12	The County and the applicant recognize the need to pave Lemmon Canyon Rd, Campbell Hot Springs Rd, and 4 acres of parking but they don't have the money to pay for it. Both parties are “exploring funding sources”	Page 30, paragraph 2	The revenue to pave these roads must be secured before these plans are approved. The roads must be paved before any ground is broken. It is an air pollution and noise pollution issue. Sierra County is one of the poorest counties in California. The cost of paving must surely be borne by the Applicant since it is the primary beneficiary. See my comments on Sierra Valley Air Quality in Item 1.11 in Table 1.

Table 3
Draft Initial Study - Red Flag Comments from Carolyn Chambers

Summary of Environmental Issues initially Classified as “Potentially Significant”

Read Pages 1 to 7 of Draft Initial Study for more detail

Red Flag Issue	Lemmon Canyon Impacted*	Sierra Valley Impacted*	Carolyn Chambers’ Comments
<i>* reflects Carolyn Chambers’ opinion of the impact</i>			
3.1 Aesthetics	7 issues		I assume that the proposed development is not visible outside of Lemmon Canyon.
3.2 Air Quality		13 issues	The level of construction, the heavy construction traffic, the increase in passenger vehicle trips by guests, the 123 wood fireplaces will have a dramatic impact on the air quality in Sierra Valley - all the way into Plumas County. See item 1.11 in Table 1 for my Comments on the air quality problem in Sierra Valley today.
3.3 Biological Resources		6 issues	Clearly the biological issues identified impact the entire Sierra Valley
3.4 Cultural Resources	6 issues		Issues limited to Lemmon canyon
3.5 Geology & Soils		10 issues	These issues appear to impact the entire Sierra Valley
3.6 Hazards		5 issues	Wildfire. The additional propane tanks, the additional overhead electrical line, the 150+ person campground combined with the overall scale of the development present a dramatic increase in fire danger to Sierra Valley and Sierraville in particular. Sierraville could burn to the ground in the blink of an eye, as happened in the Camp Fire in Yuba County in 2018.

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<i>* reflects Carolyn Chambers’ opinion of the impact</i>			
3.7 Hydrology & Water Quality		10 issues	The goal of the project is to develop between 32.4 and 63.5 acres much of which is adjacent to sensitive habitat, a deer migration route and wetlands. This report acknowledges that the primary leach field for disposal of sewage and other waste water could be subject to failure or underperformance and in that case the entire 63.5 acres will be used to develop an additional leach field. Surely, the sensitive habitat and wetlands surrounding this project will be at risk when the leach field fails, as predicted in this report. The County should require the Applicant to clean-up and pay for the restoration of sensitive habitat and wetlands that is damaged or destroyed by sewage leaking from the inadequate leach field.
3.8 Noise		1 issue	The report states that the Construction Phase of this project is expected to last over 20 years. This means that people, and equally important, the wildlife living in this area will be subjected to construction noise pollution for 7 days a week for 20+ years. During weekdays the noise will be 12 hours a day, starting at 7 a.m. On Saturdays the noise will last for 9 hours, starting at 9 a.m. On Sundays, construction noise will last for 8 hours, starting at 10 am. It is unreasonable to expect any community to tolerate this. A 20+ year Development Plan cannot be allowed. A 5 year plan for the build-out of this project is much more reasonable, with no construction allowed on weekends and on weekdays construction must be limited to 8 hours - from 9 a.m. to 5 p.m. A formal Noise Study must be done to get a full understanding of the construction noise and the noise of increased passenger traffic coming through Sierraville.

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Summary of Environmental Issues initially Classified as “Potentially Significant”

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Red Flag Issue	Lemmon Canyon Impacted*	Sierra Valley Impacted*	Carolyn Chambers’ Comments
<i>* reflects Carolyn Chambers’ opinion of the impact</i>			
3.9 Transportation & Circulation		3 issues	Sierra County is already out of compliance with Federal Air Quality standards - particularly ozone (smog) and particulate matter (PM2.5) which comes from smoke and unpaved gravel roads. PM2.5 particles are small enough to get into the lungs and from there into the bloodstream and then into the brain and other critical organs. It is bad stuff. We do NOT want more of that. Smog is caused by traffic and with this project we will have 20+ years of heavy construction traffic plus increased passenger traffic, thus increasing smog levels in Sierra Valley and neighboring Plumas County (which is also out of compliance with Federal Air Quality Standards). This project needs to be right-sized - dramatically reduced in scope. Sierra County and Plumas County must take meaningful steps to ensure that both counties meet ALL Federal Air Quality standards within 2 years.
3.10 Tribal Cultural Resources	1 issue		Limited to Lemmon Canyon.
<p><u>Total of 62 Proposed “Mitigations”</u> covering 10 potentially significant environmental issues, 48 of which impact the Sierra Valley and all of its residents. Plumas County is also impacted by the Air Quality issues.</p>	<u>14 issues</u>	<u>48 issues</u>	<p>Who will enforce and measure the effectiveness of such mitigations. What is the system of fines for non-compliance and clean-up? Where does the budget for compliance officials come from? The County does not have the personnel. County Offices are a 90 minute drive away over a 7,000 foot mountain pass.</p> <p>These mitigations were signed off by a County official (Brian Pangman, Assistant Director) as providing solutions to 100% of the environmental issues raised in the Draft Initial Study. Why? Please provide the science and factual data to support these sign-offs so that everyone may understand the rationale and have a chance to comment on it.</p>

**Table 4
Draft Initial Study - Red Flag Comments from Carolyn Chambers
Downgrading of the Environmental Impacts**

31 potentially significant impacts are identified in the Draft Initial Study and ALL were downgraded - that does not make sense. What is the science to justify these downgrades? How and why were these decisions made? Who made the decisions and what are their qualifications to do so? Did the decision makers have previous experiences in such matters with developments of this scale and scope? Please name the comparable other developments

	Potentially Significant Issues	Downgraded by County to "Less than Significant"	Draft Initial Study Page
4.1 Aesthetics	3	3	Page 36, 78
4.2 Agriculture & Forest Resources	3	3	Page 41
4.3 Air Quality	3	3	Page 44 - 45. Sierra County is already out of compliance with the Federal Clean Air Act on ALL counts except for two. Ozone (smog) levels and PM2.5 (particulate matter from wood smoke and dust) are two of the many areas where Sierra County is out of compliance. The County should not approve this project until Air Quality in Sierra County meets Federal Air Quality standards, particularly PM 2.5 and Ozone (smog). The use of wood burning fires in this project should be banned. Gravel surfaces for vehicles should be paved. The size of the project should be reduced by at least 60% and perhaps more.
4.4 Biological resources	4	4	Page 52 - 54, 56 CDFW raised concerns in this report about the impact on deer migration and on endangered and protected birds and plants.
4.5 Cultural Resources	2	2	Page 59
4.6 Geology & Soils	1	1	Page 65, 69
4.7 Hazards and Hazardous Materials	1	1	page 74, 76, 82
4.8 Hydrology and Water Quality	2	2	Page 80 - 82
4.9 Noise	3	3	Page 86 - 87 A formal Noise Study should be done given the size, duration and scope of this project

**Table 4
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	Potentially Significant Issues	Downgraded by County to "Less than Significant"	Draft Initial Study Page
4.10 Transportation/Traffic (based on 2015 traffic study)	3	3	Page 93 An updated Traffic Study should be performed, with a focus on peak periods such as Fridays through Sundays, and holiday periods.
4.11 Tribal Cultural Resources	2	2	Page 3
4.12 Utilities and Service Systems	1	1	Page 107
4.13 Mandatory Findings of Significance	3	3	Page 111
Total Potentially Significant Issues	31	31	Pages 36 to 112

Table 5
Masterplan - Red Flag Comments from Carolyn Chambers

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.1	The County has been aware of this development for 4 years (since Feb 2015)	Page 1, Paragraph 3	Why has this project been allowed to progress for almost 4 years without any input from the community? What was the thinking behind that decision?
5.2	What is the nature of the employment opportunities that the County and the applicant believe will arise as a result of this development?	Page 1, Paragraph 6	Need a break down by 1) The Construction Phase and 2) Operational Phase. Job Titles, Job descriptions, and hourly, salaried and pay scale, with or without benefits. The jobs are mostly for cleaners, massage therapists, cooks etc. Sierra County needs jobs that gives people a salary that allows people to buy a home, raise a family, buy a car and take occasional vacations. These jobs don't achieve that goal.
5.3	The applicant demands the right to build the proposed facilities in any order that meets their financial goals. Their goal is to start with a large campground for 150 people living in tents, plus a trailer park for 8 to 12 RVs.	Page 3. Section 1.20 Project Phasing	We don't need a camp-ground ghetto in Sierra Valley. Loylton had one and it has taken years for the city to rid itself of that eyesore. No campground or trailer park of this size in Sierra Valley, please. Thank you.
5.4	County Staff will review Building permits for substantial compliance with the approved master Plan	Page 3, Section 1.3 Applicable Conditions Applied to Phase Development	Full (not partial) compliance with the approved Master Plan should be required
5.5	The landowner may request modifications to the approved Master Plan and if such modifications are out of compliance with the agreed Master Plan, the landowner will have the option of requesting an "amendment to the approved Master Plan"	page 3, paragraph 1.3	This cannot be allowed. What is the point of having an approved Master Plan if the applicant has no intention of following it?

**Table 5
Masterplan - Red Flag Comments from Carolyn Chambers**

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.6	If the Applicant requests major changes to the approved Master Plan - there could be a whole new cycles of public hearings and appeals meetings with Board of Supervisors.	page 3, paragraph 1.3	Again, the approved Master Plan must be the final. Changes cannot be allowed, otherwise it is not a "Master" Plan. It is simply a perpetual draft that is subject to constant amendments.
5.7	All existing facilities are currently served by systems approved by the Sierra County	Page 4 b. Wastewater Disposal	This is false. The Applicant's existing gray water disposal system at the Hot Springs is currently out- of-compliance.
5.8	The use of gray water systems may be used to provide limited irrigation needs	Page 4 b. Wastewater Disposal	Disposing of gray water via irrigation surely is illegal when the ground is frozen in late fall, throughout the winter and early Spring. A year-round solution must be devised.
5.9	Discussion as to how to find a source of tax revenue to pay for paving Lemmon Canyon and Campbell Springs Rd	page 5 c. Access (last 2 paragraphs)	Heavy construction traffic will destroy these gravel roads and lead to a dramatic increase in air pollution across the entire Sierra Valley and particularly in Lemmon Canyon and the town of Sierraville. These roads must be paved before the project begins. The applicant is the primary beneficiary and therefore should fund the entire cost or voters should be given an opportunity to vote on a Bond Measure so that the County can borrow the money at tax-payers expense.
5.10	In developing parking areas, an effort will be made to minimize tree removal	Page 6 d. Parking	How will this be monitored? What system of fines will be levied if applicant is out of compliance. What is the approval process before the applicant can cut a tree? Who will monitor this - does the County have enough staff to monitor?
5.11	Gravel roads and parking lots will improve drainage	Page 6 e. Drainage	But at the cost of dramatically increased air and pollution from dust and noise pollution from heavy construction equipment and passenger vehicles moving over a noisy gravel surface. There will be a dramatic increase in PM2.5 levels across Sierra Valley and into Plumas County due to dust from gravel roads and parking lots. Is Plumas County aware of this?

**Table 5
Masterplan - Red Flag Comments from Carolyn Chambers**

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.12	The applicant proposes to add a 3rd overhead high voltage electrical line	Page 6 f. Electrical	Overhead electrical lines are a major source of wild fires. They caused the Camp Fire in Yuba County which destroyed the entire town of Paradise and resulted in over 80 deaths. Electrical lines also caused the Santa Rosa wild fire which partially destroyed the town of Santa Rosa. Sierra Valley is in a very high wind area. We cannot afford to approve another overhead electrical line. The line must be underground at the Applicant's cost.
5.13	Sierra valley is already grossly underserved by cell service. When the area is busy on weekends, already it can be impossible to get enough "bars" on one's phone to make or receive phone calls.	Page 6 g Telephone	This project should not be approved until AT&T and Verizon install additional cell towers so that a reasonable quality of cell service is available and has the capacity to handle the extra load expected by the increased number of guests, the staff and all the construction workers who will be working on this project for 20+ years. Lack of cell coverage is a public safety issue and this development will make it worse.
5.14	Sierra Valley residents already suffer from extremely slow internet and often no internet on weekends due to guests the people visiting the Hot Springs. we are served by slow satellite or slow landlines using a system of repeaters across the valley	Page 7 h. Broadband or Cable	This project should not be approved until cable Broadband similar that which Loyalton enjoys is made available to every household in Sierraville.
5.15	The proposed project will be served by a series of Propane Tanks	Page 7 i. Propane	This is a public safety issue. The recent Camp Fire in Yuba County was exacerbated because every had a Propane Tank in their back yard. These tanks shoot flames hundreds of feet into the air to release pressure when they become too hot. These tanks made the wild fire worse and contributed to the complete destruction of the town of Paradise and the deaths of 80 mostly elderly people. We cannot have a disaster like this in Sierraville. The County must require the Applicant to use Natural Gas instead of above ground Propane Tanks. The Applicant should cover the cost of bringing a Natural Gas line to Sierra Valley. Natural gas is less expensive and much safer than Propane.

**Table 5
Masterplan - Red Flag Comments from Carolyn Chambers**

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.16	The use of exotic, introduced and ornamental landscaping is discouraged	Page 9 p. Landscaping	Surely the use of CA native plants should be mandated for this project
5.17	Landscaping should be minimal so as not to increase fire danger in parking lots and next to buildings	Page 9 p. Landscaping	This implies that views (Aesthetics) will be severely negatively impacted by this project because it will be impossible to adequately and safely use vegetation to screen from view: 400 parked cars on the proposed 4 acres of parking lots, the unsightly Shower Rooms, Toilets, Maintenance Facilities, or the Maintenance yard with heavy equipment and 7.5 acres of campsites with 50 tents and a trailer park with 8 to 12 RVs. This is not acceptable. The project must be scaled back dramatically.
5.18	This masterplan includes the basic environmental standards...that have proved effective in other areas of the Sierra	Page 9 1.40 Environmental Standards	What standards are these? Please provide documentation detailing these standards. Please list the other Sierra areas where such standards have been effective and provide a contact person in each area so that a discussion can take place
5.19	The Erosion Control section emphasizes the need for constant vigilance and monitoring throughout construction from a certified practitioner. It also talks about Best Management Practices for erosion control	Page 9 a. Erosion Control	How is compliance to be monitored by the County? A system of fines should be specified for every out of compliance event, based on severity and frequency, damage to the environment and cost to repair. Who will fund (pay the salaries and benefits) for the new Compliance officials that Sierra County will need to hire? With the County offices being at least 90 minutes away over a 7,000 foot mountain pass, will these officials live on-site for the 20 year construction phase of this project?
5.20	The Erosion Control section states that "If possible all grading should be completed during the dry season"	Page 9 a. Erosion Control	This must be a mandatory requirement.
5.21	The Drainage Crossings section states that the projects "drainage capacity will handle normal storm events without damage or hazard"	Page 11 e. Drainage Crossings	It does not seem sensible to assume "normal storm events" considering that we had 100 year flood events in 1997 and 2016. What will be the impact on the environment in the event of another big flood in 10 years - they seem to occur every 10 years on average.

**Table 5
Masterplan - Red Flag Comments from Carolyn Chambers**

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.22	This section states that gravel roads and parking areas are consistent with that of other Sierra County resorts, such as the Lakes Basin, Big Springs Gardens and camp grounds	Page 11 f. Road and Parking Surfacing	None of these resorts have the level of use or vehicle roundtrips that this development will have. This comparison does not make sense.
5.23	This section also states that "gravel surfaces can create dust, decreasing air pollution, coating all surfaces with dust, and annoying walkers and bicyclists along the roadways".	Page 11 f. Road and Parking Surfacing	Exactly. This is why I believe that 1) these roads must be paved as a pre-requisite to breaking ground on this project and 2) the project should be dramatically scaled back to reduce air pollution and 3) a formal Noise Study should be performed because not only are gravel roads and parking lots a major source of air pollution but they are also a source of noise pollution. Both of which are detrimental to the people, birds, wildlife and plants that live in this area. Furthermore, Sierra County is already out of compliance on ALL Federal and State air quality measures, with the exception of two minor ones. Sierra County is out of compliance with Ozone and PM2.5. Dust is a major contributor to PM2.5, as is smoke. Paving these roads must be mandatory BEFORE any work begins on this project.

**Table 5
Masterplan - Red Flag Comments from Carolyn Chambers**

Item	Masterplan Item	Page Number	Carolyn Chambers' Comments
5.24	The applicant wants the County to approve a Development Agreement so that the Masterplan is valid for 20 years - until 2039 - and with the option to seek additional extensions beyond 2039 if the County Board of Supervisors is in agreement	Page 12 1.45 Development Agreement	<p>This cannot be allowed. What we know is that all sorts of laws will be introduced and others amended between 2019 and 2039. The climate will change, air and water quality may deteriorate. Fire will become more common. No-one can see 20 years into the future. It is too risky to grant the Applicant a 20 year approval for the Master Plan, via the proposed Development Agreement. Wouldn't that make the Applicant exempt from complying with new laws that are introduced? Surely we don't want to do that? Surely, it makes more sense to approve a dramatically down-sized version of the Master Plan for 5 years WITHOUT a Development Agreement attached and without rezoning there Applicant's property.</p> <p>I believe that the Applicant is seeking 20 years because their goal is to sell Sierra Hot Springs to another Developer with these entitlements attached. I doubt that Sierra Hot Springs parent company, which is a tax-exempt 501 (3) © organization could convince any bank to lend them the \$15 million to \$30 million that it would cost to build this project. Construction costs in Truckee are 300 sq ft and this is a 98,000 sq foot project. If Sierra County costs are 50% of Truckee costs, then \$15 million in construction financing would be needed. I don't think the Applicant can raise qualify for a construction loan of that size.</p> <p>I suspect that the Applicant's goal is to sell Sierra Hot Springs because the Applicant needs money to rebuild their Harbin Hot Springs property which was destroyed by fire in 2015. Immediately after that fire, the Applicant embarked on the Sierra Hot Springs Development proposal. What an odd coincidence, wouldn't you say? Could it be that Harbin Hot Springs was under-insured - so it is still in ruins 4 years after it burned?</p> <p>Harbin Hot Springs, not Sierra Hot Springs, was the Applicant's cash cow. They need to rebuild Harbin and they plan to sell Sierra Hot Springs with this Masterplan, 20 year Development Agreement and Rezoning in place to raise money to rebuild their cash cow. I think it is that simple.</p>

Table 6
Draft Initial Study - Red Flag Comments from Carolyn Chambers
Infrastructure

	Infrastructure Item	Page Reference	Carolyn Chambers' Comments
6.1	Wells, water & sewer lines	Page 18	No comments
6.2	Septic tanks and leach fields	Page 69	<p>A viable solution, one that works throughout the calendar year, for disposal of gray water has not been proposed.</p> <p>The County acknowledges that the primary leach field for disposal of sewage and other waste water could be subject to failure. Why wait for a failure before developing an appropriately sized leach field? It is less expensive to avoid an environmental disaster than to clean one up.</p>
6.3	Electrical lines	Page 19	<p>The 3rd electrical line should be underground. The County should work with the State and the Applicant to make this happen. The proposed 3rd overhead high voltage line presents a major fire hazard, especially during high wind events which frequently occur in Sierra Valley. The Camp Fire disaster in Yuba County, which destroyed the town of Paradise and the Santa Rosa wildfire were started by electrical lines during high wind events.</p>
6.4	Roads	Page 30 paragraph 2	<p>Roads and parking lots must be paved before this project begins to reduce air and noise pollution. The Study states that paving will be at "applicant's discretion" and that a source of funds to cover the cost has not been found, by the applicant or Sierra County. Sierra County should have a funding source lined up and approved before this project is approved.</p>
6.5	Phone	Masterplan Page 6g.	<p>Sierra Valley is already grossly underserved by cell service. Today there is inadequate cell tower capacity to handle the current population plus visitors to the area. On busy weekends and holidays it can be impossible to get enough "bars" on one's phone to use it. This is becoming a public safety issue since many people do not have land lines. How can people call for help in an emergency? The project should not be approved until Verizon and AT&T install new cell towers to provide a level of service comparable to Truckee. The increased demand that this project will place on cell tower capacity is a serious public safety issue and a disaster waiting to happen.</p>

Table 6
Draft Initial Study - Red Flag Comments from Carolyn Chambers
Infrastructure

Infrastructure Item		Page Reference	Carolyn Chambers' Comments
6.6	Internet	Masterplan Page 7 h.	Only the city of Loyalton has broadband. The Sierra Valley is “served” by slow and expensive satellite internet (whose capacity is already at its limit) and by a slow terrestrial internet infrastructure based on a system of repeaters that are mounted on structures such as buildings, trees and poles across Sierra Valley. A requirement of this project should be that modern, high speed Broadband cable is extended from Loyalton to Sierraville. This will benefit guests of the proposed development and Sierraville residents, alike. Reliable high speed internet service with enough capacity for all will bring better paying jobs to the community. The County should work with State officials to secure funding and make this happen.