

January 24, 2019

Dear Mr. Pangman, Sierra County Planning Commissioners, and Sierra County Supervisors:

I am writing about the proposed development at the Sierra Valley Hot Springs. I have read the "Study & Proposed Mitigated Negative Declaration" and have numerous concerns and questions about the proposal and the review process.

I understand that much work has been done on this over the last three years, but I am unaware of any outreach for public comment since the public meeting at the Hot Springs. I wrote a letter in June, 2015 expressing some concerns about the proposal and never had a response to that. This is disappointing since at that time it seemed clear that a proposal of this magnitude in a very environmentally sensitive area would need to go through a vigorous Environmental Impact Review. Anything short of that is unacceptable.

I have had a chance to review many of the letters by others who have concerns about the environmental issues and will not go into the same informative and thorough details that they have provided. Rather I will try to keep this as brief as possible, highlighting some of the problems I see with the proposed mitigations.

All of the following are major areas of concern, and the Study in no way provides acceptable "mitigations": If there have been background studies, every one of them should be made public with a new (at least) 30 day review/comment period. In the absence of supporting documents, it appears that broad general assumptions have been made with no scientific and or factual basis for these assertions. In general the concept of approving the proposal with a wide range of specify studies to be done at a future time is unacceptable. Any and all studies should be done before approval is given to the project. For example, it would be imperative to know that there would be an adequate water supply for the proposed facilities, including fire suppress BEFORE any approval is granted.

Another substantial change would be the need for a realistic plan for a shorter period. Nothing should be approved before specific detailed plans are submitted for review for each aspect of the development. No Declaration Agreement for more than a five year period should be allowed. A new proposal review and associated permits should be required for any work that cannot and is not completed within that time frame.

One of my biggest concerns is what I believe to be an inaccurate estimate of how many people would be visiting the resort at maximum capacity. This figure is critical for assessing the validity of most of the other claims and planning decisions. The Study says that the current maximum capacity is 394 people and that new maximum capacity after the full build out would be 529. A simple review of the proposed number of new campsites, lodge rooms, guest cabins, residential housing for staff, capacity of the restaurants, meeting rooms and dormitories, PLUS day use at the facilities including guests at their sister properties at the Globe Hotel and Calpine Lodge, would put the number at least 700 and much more likely at 1000+. The estimates they use for traffic are based on studies allegedly done in 2015. Local residents can attest that there has been a significant increase in traffic since then, certainly not the assertion in the Study that traffic has decreased since the study was done. These two examples are significant and appear to be indicative of the quality other aspects of the Study, raising the question of the accuracy of the entire document.

It is impossible to determine how the rating of Less than Significant was determined from the following aspects of the Study without seeing the background studies that have been cited. In order for the public to assess this rating, the background studies would need to be provided and the comment period would need to be extended, as requested above, at least another 30 days after all of the relevant documents have been made public. The “Less than Significant” ratings are unsubstantiated for the following areas:

1. Aesthetics, especially the determination the size and placement of the proposed campground.
2. Agriculture and Forest Resources: much more information needs to be made available about compliance with the General Plan and zoning variances requested, as well as conversion of farmland, forest and agriculture land.
3. Air Quality: need to have more information about how the “Less than Significant” assessments were made. As is true for many aspects of the findings, an inaccurate estimate of how many people would be at the resort at maximum capacity affects the accuracy of this determination.
4. Biological Resources: It is imperative that the referenced study done in 2015 be made available before any determination of how significant this project would be on Biological Resources. I have many concerns about this section. Some obvious ones are that a survey was done at the end of October of 2015. This a time of year when most breeding and migratory birds have departed the area and before the large number of wintering raptors arrive. There is no other time of year when there is less avian diversity. There are excellent resources available that give historical information of migratory and breeding bird populations in this area. Any study that has been done needs to be made public and it seems clear much more work need to be done on birds, plants and mammals before any determination may be made, especially since there are likely to be threatened and endangered species in this area.
5. Cultural Resources. It would be helpful to see cited sources.
6. Geology and Soils: as above, need to see background information used to make the assessment.
7. GreenHouse Gas Emissions: as above, need to see background information used to make the assessment.
8. Hazards and Hazardous Materials: as above, need to see background information used to make the assessment.
9. Hydrology and Water Quality; this is a crucial area and as above, need to see background information used to make the assessment.
10. Land Use and Planning: as mentioned earlier, it is unclear how this proposal is a consistent in the General Plan; need more information.
11. Noise: among other concerns, the initial Plan indicated a desire to make the facility available for fly-in guests. I see no mention of how the anticipated use for fly-ins would contribute to an increase in noise levels. Any increase in use of the airport needs to be considered and studies as this would have a major impact on noise in the community.
12. Population and housing : as mentioned above their estimates appear to be inaccurate and significantly understand. A new estimate needs to be prepared and all other aspects of the Study need to be updated to reflect a more accurate number.
13. Public Services. This is a crucial area. More information needs to be given about how local services such as fire, emergency medical, water management, road work will be affected.
14. Transportation/Traffic: The information provided is based on studies apparently done in 2105. This has to be updated before any accurate assessment may be made.

Some have put forward enthusiastic estimates of what revenues the county *might* receive from the proposed development. I have not seen any corresponding summary of what the additional costs to the county would be. For example, there would be significant expenses in overseeing the project during building stages and compliance reviews as well as the cost of providing ongoing basic services such as waste management, road maintenance, and emergency services.

Some have said the General Plan anticipates the kind of development proposed at the Hot Springs. While it appears that indeed some kind of development was anticipated, it also appears that the General Plan does not allow for this scale of development and/or some important aspects of the proposal. The first “Fundamental Goal of the County’s General Plan” is:

“It is the County's most fundamental goal to maintain its culture, heritage, and rural character and preserve its rural quality of life.”

In my opinion, this is a lofty and wonderful goal for the county to keep in mind, and the the proposed development is absolutely inconsistent with this most basic goal. Slerraville and Sierra Valley are unique and wonderful places. The beauty and serenity of this special area could be ruined unless there are significant changes to the proposal.

Thank you for your consideration.

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cc. Members of the Planning Commission

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#### Other Public Agencies

- State Water Resources Control Board
- California Department of Fish and Wildlife
- US Army Corps of Engineers
- Regional Water Quality Control Board
- Northern Sierra Air Quality Management District
- Caltrans
- CAL Fire