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September 16, 2024

To: Calaveras County Interim Planning Director Peter Maurer  
Project Planner Katherine Stefani  
County of Calaveras, 891 Mountain Ranch Road, San Andreas, CA 95249

Cc: Calaveras County Planning Commission, D1 Supervisor Tofanelli

From: C. Platt, Secretary, MyValleySprings.com

RE: Comments re. Fairfield Hotel / Restaurant San Andreas Initial Study/MND

*Sent via email*

Dear Director Maurer, Planner Stefani, Planning Commission, and Supervisor Tofanelli,

MyValleySprings.com believes the proposed Fairfield Hotel / Restaurant San Andreas Initial Study and Mitigated Negative Declaration (IS/MND) August 2024 is inadequate in some important areas, like Sewage and Traffic, and others. The IS/MND does not address or mitigate many negative environmental impacts of the proposed hotel / restaurant project.

Please read and respond to our concerns and questions below about the Hotel IS/MND.

**1) Sewage Disposal, WWTP Inadequate. Section 4.19 Utilities and Service Systems - INADEQUATE WASTEWATER TREATMENT CAPACITY, SIGNIFICANT NEGATIVE ENVIRONMENTAL IMPACTS NOT MITIGATED; IS/MND INCONSISTENT.**

The **San Andreas Sanitation District (SASD) does NOT have the capacity to treat an additional 14,000 gallons/day of sewage the hotel project would generate.** There is no existing capacity to serve future growth; expansion of the WWTP would be needed, and would require funding. The proposed Hotel / Restaurant project is in the SASD Service and SOI area. "Wastewater Treatment and Conveyance – The San Andreas Sanitary District (SASD) operates and maintains sewers in most of San Andreas, including the project site." ( IS pg. 4.19-1) There is no other place besides the SASD to dispose of project sewage. Expansion of the SASD Waste Water Treatment Plant (WWTP) is needed before the hotel could be built—who will pay to do this? **The IS/MND does not offer any solution, Mitigation or Project Condition that addressed this wastewater disposal inadequacy.**

The Initial Study itself makes contradictory statements whether or not there is sufficient capacity in SASD's WWTP (pages 4.19-1 to 4.19-4). See below:

--"***Wastewater Treatment and Conveyance – The San Andreas Sanitary District (SASD) operates and maintains sewers in most of San Andreas, including the project site.***" ***Due to limitations on capacity expansion at the existing SASD WWTP, the SASD reported it will need a new plant to serve projected growth. The SASD reported that reserve capacity does not exist for in-fill development***"

-- Then, on page 4.19-2, the IS states, "***Sufficient wastewater treatment capacity is available in the region for project wastewater generation, and project development would not require construction of a new or expanded wastewater treatment facility.***" (pg. 4.10-2)

**Where else is WW treatment available??**

No evidence is provided in the IS/MND to support this statement that wastewater capacity is available elsewhere. The Hotel Project must use the SASD. Where else would the project's wastewater be treated, if not San Andreas? There are no other wastewater treatment options, no other WWTPs nearby. Is the IS/MND thinking 14,000 gallons a day could be transported to some other county?? If so, that's "nuts" (technical term).

There is no other wastewater treatment option for the Hotel / Restaurant project besides the SASD and the San Andreas Wastewater Treatment Plant, which must be expanded before it can handle new hotel sewage. The proposed Hotel / Restaurant Project needs to pay for the necessary expansion of San Andreas wastewater treatment plant capacity, as a Mitigation of impacts and Condition of the Project Approval. Residents of San Andreas should not be funding expansion due to new development.

**2) Safety and Traffic. Section 4.17 TRANSPORTATION -SIGNIFICANT NEGATIVE IMPACT ON TRAFFIC, NOT MITIGATED.**

A new 79-room hotel and restaurant in San Andreas would generate a significant amount of new traffic accessing Hwy. 49 (St. Charles St.) and would impact existing intersections. **These impacts are acknowledged in Appendix 12, Traffic Study** (Executive Summary, Trip Generation, Existing-Plus-Project Conditions, pages 4-7). See quotes below:

***The Project is expected to generate approximately 890 vehicle trips per day (445 trips entering the site and 445 trips exiting the site). Peak-hour traffic volumes are expected to be on the order of 61 trips during the a.m. peak hour and 69 trips during the p.m. peak hour.***

***The existing-plus-Project conditions analyses indicate the Project may exacerbate delays by more than 5.0 seconds per vehicle during the p.m. peak hour at the intersection of Mountain Ranch Road and St. Charles Street, which is already operating at LOS F in the existing condition.***

***“The Project may be responsible for an equitable share of the cost of the future improvement if there are no applicable road impact fees that include the improvements. If the Project constructs improvements, it is recommended that a fee program be utilized to provide reimbursement of costs above the equitable share.”***

But in the IS/MND, **Section 4.17 TRANSPORTATION**, the **Project has a “Less than Significant Impact”**. **No mitigations are called for**. THIS IS INCORRECT, and INADEQUATE MITIGATION, as demonstrated by the quotes above from the Traffic Study. Section 4.17 of the IS/MND states on page 4.17-1:

***a) Would the project conflict with a program plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities?  
Less than Significant Impact***

But this statement is later contradicted by a statement on page 4.17-4, under LOS:

***“The project site and the anticipated study locations are located within the San Andreas Community Area. Therefore, for the purpose of the traffic study, it is proposed that a traffic issue may be identified if the addition of the traffic generated by the project results in any one of the following:***

- Triggers an intersection operating at acceptable LOS (A, B, C, or D) to operate at unacceptable levels of service (E or F);
- **Increases the average delay for a study intersection that is already operating at unacceptable LOS (E or F) by 5.0 seconds or more.**

Clearly, both the Traffic Study AND the IS acknowledge that the Project **will generate 890 vehicle trips per day**, and ***“analyses indicate the Project may exacerbate delays by more than 5.0 seconds per vehicle”*** at the Mountain Ranch Road intersection, which is already at **LOS F**, and that the ***“Project may be responsible for an equitable share of the cost of the future improvement if there are no applicable road impact fees that include the improvement.”***

**Why is the Project not being required to mitigate this significant negative transportation impact on San Andreas intersection delays, which both the Traffic Study and the IS/MND acknowledge?** The Project could either pay a share of the cost to improve that intersection, or pay RIM fees if they include the Mountain Ranch Road intersection improvement. St. Charles Street, Highway 49, is a major highway that runs through the middle of San Andreas, and already has issues with pedestrian crossing safety, truck access, and intersection delays. **The Project needs to mitigate its negative impacts on Transportation and Safety on St. Charles Street as a mitigation and Condition of the Project.**

### **3) Housing. Conversion/loss of MultiFamily and Affordable Housing Site.**

The Project Applicant requests to rezone one parcel from MF to C2 zoning. This will eliminate a potential multifamily (MF), affordable or rental housing site in Calaveras County. There are a very limited number

of MF housing parcels in the County. **How is the impact of eliminating a Multifamily and potential affordable housing site been addressed or mitigated in the IS/MND?**

**4) Aesthetics.** The proposed hotel **project height violates County height limitations**. Why does the hotel need to be 4 stories high, in a quiet rural town with no obvious demand? It could be easily scaled down to 3 stories instead of 4, if reduced somewhat in size and capacity. Is there a proven need for 79 new hotel units in San Andreas? **Is a desire for 79 units important enough to override the negative impacts of this extreme height on aesthetics in historic San Andreas?**

**5) Lack of Critical Agency Review.** The Fairfield Hotel Project proposal and application should have already been circulated and routed for review and comments to the local San Andreas Sanitary District (SASD), the Regional Water Quality Control Board, and LAFCO. If consulted, these agencies would have responded and commented on the lack of wastewater treatment capacity in San Andreas for future growth without expansion of the WW treatment plant.

**The Fairfield Hotel / Restaurant San Andreas Initial Study/MND is inadequate, contradictory, and does not address or mitigate all negative environmental impacts of the proposed project. The inadequacy/absence of wastewater treatment capacity alone could require an EIR. Please revise the IS/MND to address all issues raised.**

Thank you for the opportunity to comment, and for your consideration of these problems.

Respectfully,

Colleen Platt, Secretary  
MyValleySprings.com

Cc: Planning Commission, D1 Supervisor Tofanelli  
Joyce Techel, President, MyValleySprings.com and D1 Resident