significance threshold for determining impacts to roads and intersections. DEIR at 9-32. A volume-to-capacity ratio is a measure that compares a roadway demand (vehicle volumes) with roadway supply (carrying capacity). The volume of traffic from the Project would exceed the capacity of certain roadway segments and come close to exceeding the roadway or intersection capacity at other locations. *See e.g.*, DEIR at 9-49 (Table 9-20, showing that Squaw Valley Road between Squaw Creek Road and the village area would operate at a V/C ratio of 1.02), DEIR at 9-64 (Table 9-23, showing that state highway segments such as SR 28 east of SR 89 would operate at a V/C capacity of 0.96). Nor can the DEIR credibly assert that the Project's myriad significant traffic impacts have been adequately mitigated because, as mentioned above, the EIR ultimately concludes that these impacts would be significant and unavoidable. DEIR at 9-57-9-63.

d. General Plan Policies 1.K.1 and 1.K.5

The DEIR concedes that the Project would result in significant and unavoidable impacts to visual impacts. DEIR at 8-50; 8-53; 8-56; 8-60. Consequently, the Project would be flatly inconsistent with General Plan policy 1.K.1, which requires new development to maintain the character and visual quality of the area, and policy 1.K.5, which requires the design of new development to fit the natural terrain. FEIR at 3.2.4-440 and 441. The FEIR authors attempt to spin this inconsistency as best they can when they assert that "the project appears to be visually consistent with the character of the project area, even if it would result in significant visual impacts." This sentence is not only illogical, it is meaningless. Recognizing its vulnerability, the FEIR then suggests that the Project would be consistent with these General Plan policies because the EIR's mitigation measures would reduce impacts to scenic resources. *See* FEIR at 3.2.4-538, 539 (response 09-244). Yet, the EIR's conclusion that the Project's visual resources impacts would be significant and unavoidable undercuts this argument entirely.

e. General Plan Policies 6.A.3 and 6.C.1

In numerous instances, the DEIR made many of the Project's inconsistencies with the General Plan clear. For example, the DEIR acknowledged the Project's significant impacts to sensitive habitats including wetlands, wet meadows, and riparian vegetation. DEIR at 2-14 through 2-39; FEIR at 3.24-535 (response no. 09-231). These impacts make the Project inconsistent with, for example, General Plan policies 6.A.3, and 6.C.1, which require the County to avoid impacts to and protect such resources. In responding to our comments, the FEIR suggests that biological resources mitigation measures would eliminate any General Plan inconsistencies. FEIR at 3.2.4-535 and 536 (response numbers 09-230 and -9-231).

SHUTE, MIHALY & WEINBERGER LLP

Although these mitigation measures *may* serve to offset the loss of habitat and wildlife that the Project would cause, they do not resolve the conflicts between the Project and the General Plan. For example, Mitigation Measures 6-1a and 6-1b require the applicant to provide compensatory habitat and to comply with restoration standards. Mitigation Measure 6-9 requires the applicant to compensate for tree removal. These measures do not prevent impacts—they are after-the-fact measures designed to make up for losses. Restoring habitat elsewhere does not "preserve" the area's established resources, as the General Plan requires.

06-40 (cont.)

f. General Plan Policy LU-P-5

The FEIR also fails to adequately respond to comments or ignores comments entirely. For example, the FEIR fails to respond to our comment that the Project is inconsistent with Placer County Area Plan policy LU-P-5, mandating that the County "[d]irect development towards Town Centers and preserve the character of surrounding neighborhoods." FEIR at 3.2.4-446 (comment no. 09-259, 260) and 3.2.4-543. As we explained, the Project is clearly inconsistent with this policy because it locates a substantial amount of development seven miles northwest of the town center of Tahoe City and captures redevelopment potential that could otherwise be directed to Tahoe City and Kings Beach. The FEIR's response directs the reader to Master Response 3.1.15, however this response fails to address this issue at all.

g. SVGPLUO Policies

The FEIR also fails to resolve the numerous inconsistencies with the SVGPLUO. For example, while the FEIR acknowledges that the Project would be inconsistent with provisions in the SVGPLUO calling for new development to meet certain standards, "including that they not increase peak-period congestion and delay (SVGPLUO, page 44)," the FEIR uses flawed reasoning to conclude that the Project is consistent with this policy. FEIR at 3.2.541 (response no 09-253). The FEIR simply downplays the Project's significant increase in traffic trips, congestion and delays, and goes so far as to assert that the DEIR likely overestimated Project-related trips so that peak-period conditions will be acceptable. *Id.* at 3.2.542. The EIR cannot have it both ways. If the DEIR's analysis was inaccurate, it should be revised to correct the errors. If the DEIR's analysis was correct, intersection and roadway levels of service would operate at unacceptable service levels, resulting in inconsistency with the SVGPLUO.

SHUTE, MIHALY & WEINBERGER LLP

11. The EIR Continues to Provide a Misleading and Incomplete Analysis of the Project's Population, Employment, and Housing Impacts and Growth-Inducing Impacts.

Sierra Watch and others commented that the DEIR's analysis of the Project's population, employment, and housing and growth-inducing impacts were inadequate and underestimated the Project's impacts. Rather than correct these inadequacies, the FEIR still obfuscates the Project's true impacts by, for example, presenting the information in a way that unrealistically minimizes the number of individuals the Project would draw to the area as employees. First and most egregiously, the EIR obscures the Project's impacts from bringing in new employees by continuing to rely on "FTE"—or full-time equivalent—employees to characterize the number of employees the Project would attract, despite the fact that the average number of FTE employees year-round is far below the actual number of people who would be working at the Project during the peak seasons.

06-41

The County claims that it is appropriate for it to consistently refer to the Project as adding an estimated 574 FTE employees "because the County's employee housing policy is based on FTEs." FEIR at 3.2.4-657 (response no. 012b-10). This makes no sense. The County's employee housing policy is relevant *only* for determining whether the Project satisfies the County's requirement for providing a certain amount of employee housing. It has nothing to do with the actual number of employees coming to the area, especially when some of them would be part-time. *See* DEIR at 9-34.[20] Remarkably, the EIR fails to mention anywhere in the EIR except in the Transportation chapter that some employees would be part-time, and nowhere reveals the total number of part-time employees. *See id.*

[20] The County argues that "the total number of employees is anticipated to be consistent with the FTEs, because most shifts would be 8 hours." FEIR at 3.2.4-657 (response no. 012b-10). This is not convincing. "FTE" means "full-time equivalent," and a full-time employee would work eight hours a day five days a week—40 hours per week. A part-time employee who works an eight-hour shift may work only two or three days a week (16-24 hours per week), and thus one "FTE employee" may, in reality, be made up of two individuals. With a significant number of part-time employees (*see* DEIR at 9-34), counting employees by FTE underestimates the actual number of individuals who would be employed.

Estimating how many employees would be full- or part-time is essential to an adequate analysis of the Project's population, employment, and housing impacts. As Nevada County Supervisor Richard Anderson explained in his comments on the DEIR, two employees each working half-time would count as only one "FTE employee," but both of these people would need housing. FEIR at 3.2.3-3 (comment no. L1-2). Bringing greater numbers of employees to the area causes additional impacts as well, such as more people driving to the resort, with attendant impacts to traffic, air quality, and parking shortages, as discussed above. Relying on "FTE employees" to describe the number of employees the Project would bring to the area causes the EIR to fail its informational purpose and is completely misleading.

06-41 (cont.)

Relying on "FTE employees" as the measure of the Project's employees also results in the appearance that more employees would have on-site housing than the Project could actually provide. For example, when downplaying the Project employees' demand for housing, the County states that "[f]ifty percent of the FTE housing would be provided by the project." FEIR at 3.2.4-544 (response no. 09-264). This is technically true, but it makes it sound like around half of the housing needed by the Project's new employees would be provided by the Project—which is not true. Only 201 of the Project's projected maximum 751 new employees would have on-site housing.

Even worse, in its response to comments, the County states that because of the Project's on-site housing, only 375 employees would need to look for off-site housing. FEIR at 3.2.4-657 (response no. 012b-10). The County's math is wrong. The Project would, during peak seasons, bring approximately 751 new individuals to the area as employees. DEIR at 9-34. The Project-provided housing would accommodate 201 of the new employees. DEIR at 5-12 – 5-13. This leaves *550* new employees during the peak season seeking housing elsewhere in the Olympic Valley and beyond—not 375.

Further, the EIR underestimates the number of the Project's employees who would seek off-site housing because the EIR assumes the Project's on-site housing would be equally appropriate to house all its employees. However, the Project's on-site housing will be mostly dormitory-style, with residents living four to a room, in bunk beds. DEIR Appx. D at 4. A few of the units would be private studio apartments for couples or individuals desiring more privacy. *Id.* However, none of these options are viable for employees with families, meaning all those employees would have to seek off-site housing.

Second, in response to our comment that the EIR should consider housing impacts based on when demand is highest, the County essentially argues that because the

Project's employees would be largely seasonal, they would have negligible demand on housing. For example, the County claims that "a large percentage of [seasonal] employees will seek temporary housing," such as "rent[ing] rooms in existing homes in the region," and thus they "do not, typically, require (or can afford) new housing accommodations." FEIR at 3.2.4-544 (response no. 09-264). The EIR then concludes that, accordingly, these employees will not significantly increase demand on housing in the area. This defies logic.

06-41 (cont.)

There are, presumably, a finite number of individual rooms or other affordable housing available for rent in the area, but the EIR acts as if these are a limitless resource available to seasonal employees, thereby failing to consider the impact of increased competition for this housing resource. Also, that seasonal employees would not seek out (or be able to afford) newly constructed housing in the area does not mean that they would not potentially increase demand on housing to the point that new housing must be built. Or that, should the employees be unable to find affordable housing in the area, that they would not commute from long distances where they could find such housing, thereby adding to traffic, VMT, and air quality impacts. Indeed, the EIR recognizes that there is a "known lack of *affordable* housing" in the area. FEIR at 3.2.4-658 (response no. 012b-10) (emphasis original). Those 550 new employees—or the people they displace in their hunt for affordable housing—would need to sleep somewhere during the peak season. The EIR must disclose this and discuss the impacts of developing housing or other methods to meet this demand.[21]

Third, the EIR's application of lodging-occupancy assumptions to employee occupancy is unjustifiable. The EIR claims that the Project's on-site employee housing, which would provide housing for 201 new employees, would "result in an average overnight population increase of 111 individuals, assuming a 55% occupancy rate on average for the year." DEIR at 5-11. In our comments, we pointed out the clear error of assuming only 55% occupancy of employee housing, based on hotel occupancy.

[21] The EIR also attempts to minimize the impact of the new employees the Project would bring to the area by claiming that "[m]any of the employees may currently reside in the general project area, and may commute to Olympic Valley from an existing residence." DEIR at 5-11. The EIR makes this claim right after it describes the Project's employees as "fluctuat[ing]" and "largely transient." *Id.* The County strains credulity when it claims in the same breath that employees would have few housing impacts because they are largely transient and that they would have few housing impacts because they already live in the area.

SHUTE, MIHALY & WEINBERGER LLP

See FEIR at 3.2.4-449 - 450 (SMW letter, comment no. 09-265). We commented that the DEIR must explain why applying a 55% occupancy rate to employee housing is appropriate. *Id.* The County's lackluster response in support of its employee-occupancy assumption is that "[e]mployment would be expected to fluctuate seasonally, concurrently with use (occupancy) of the project." FEIR at 3.2.4-544 (response no. 09-265). This is an insufficient explanation.

Short-term lodging occupancy and employee occupancy are not directly correlated. The 55% average annual occupancy rate is based on *tourist-lodging* occupancy assumptions that range from 28% in November, the slowest month, to 77% in August, during the high season.[22] *See* FEIR, Appx. A (Updated Water Supply Assessment), Appx. A (Farr West), Appx. A (McKay & Somps), Appx. A (Updated Water Demand Calculations) at 3, 8. But the EIR uses these same occupancy assumptions for *employee* occupancy, despite a complete lack of evidence—much less substantial evidence—supporting this approach. *See* DEIR at 5-11. Indeed, the most reasonable assumption in this case would be that employee occupancy rates would not be directly correlated to lodging occupancy rates, because there will always be a certain minimum number of employees necessary to run a resort, regardless of how many overnight visitors are actually in residence.

06-41 (cont.)

And even if a lower-than-100% occupancy rate could be assumed for the Project's employees generally, it is inappropriate to assume anything less than 100% occupancy of the on-site employee housing. The EIR claims that the Project's new employee housing for 201 individuals would result in "an average overnight population increase of 111 individuals, assuming a 55% occupancy rate for the year." DEIR at 5-11. However, the Project's on-site housing would accommodate only 201 of the up to 791 new employees that the Project would bring to the area, meaning there will be far more demand by employees for this limited affordable housing than there would be by tourists for the Project's expansive luxury lodging.

If nothing else, during the high season, when there will be 791 new employees seeking housing in the area, there will certainly be 100% occupancy of provided employee housing. But even during the slow season, when the number of the Project's employees would be lower, it is most likely that the on-site employee housing will be full. As explained in the EIR and below, there is a shortage of affordable housing

[22] As noted above, these occupancy assumptions are too low for the Project, even for tourist lodging.

in the area, and the on-site housing is exactly the kind of affordable housing that the Project's generally low-wage employees would need. Accordingly, it is most likely to be the first housing filled by the Project's employees. The County's position that affordable, on-site employee housing—likely to be the most desirable housing available to employees—would be, on average, only half-full throughout the year is absurd.

Fourth, the FEIR still does not adequately explain how the Project's employees' commercial and service needs would be satisfied. *See* FEIR at 3.2.4-449 (SMW letter, comment no. 09-263). The County emphasizes that the Project would include substantial "tourist-serving commercial space," (FEIR at 3.2.4-544 (response no. 09-263)), but beyond a convenience store geared toward employees, it does not explain how the Project would provide for *employees'* needs, which would likely differ substantially from short-term, recreational visitors' demands. For example, the County explains that the existing Intrawest Squaw Village's commercial space is "underutilitized" and could thus provide employees with what they need. FEIR at 3.2.4-653 (response no. 012b-2). But that space is geared toward the demands of tourists and other short-term, recreational visitors. It is not designed to serve the needs of longer-term residents, who need things like affordable groceries, healthcare, clothing, housewares, and hardware—not spas, art galleries, chocolatiers, and the high-end pet emporium provided at Intrawest Squaw Village (*see* http://squawalpine.com/events-things-do/village/shopping). To provide the public and decision-makers with sufficient information to accurately assess the Project's impacts—which may include inducing new development or travel in response to new demand for retail and services from employees—the EIR must supply this information.

The County also claims that we did not provide "specific details related to the needs of employees that should have been discussed" in the EIR. FEIR at 3.2.4-546 (response no. 09-273). Actually, this is what we were asking the County to address, which is its responsibility under CEQA—not ours. Further, the County should know what sort of needs we were asking to be discussed because the DEIR analyzed, albeit inadequately, how the needs of employees living on-site would be met. We also asked that the same analysis be made for the same needs of employees living off-site, who would be far less likely to use the convenience store and other retail offerings on the Project site. FEIR at 3.2.4-452 (SMW letter, comment no. 09-273). The FEIR did not correct this error.

Finally, the FEIR still does not consider how the Project might lead to further recreational and tourism growth in the Project area, or induce other resorts in the greater Tahoe area to expand. *See* FEIR at 3.2.4-453 – 453 (SMW letter, comments nos.

09-275, 09-276). The County responds that the Tahoe region "exists as [a] tourist destination" due to "snow-sports and supporting resorts." FEIR at 3.2.4-546 (response no. 09-275). Thus, it continues, there is no reason to think the Project would "somehow substantially increase the likelihood of inducing further recreational and tourism growth in the area beyond what would be created by the project." *Id.*

06-41 (cont.)

But, as the EIR makes clear, the predominant goal of the Project is to transform Squaw Valley from a winter-sports resort to a year-round resort—something new to Tahoe. *See, e.g.*, DEIR at 3-7. This influx of new *summer* visitors would very likely encourage development of other tourist-serving, summer recreational opportunities unlike anything Tahoe has seen before. Indeed, the County itself admits the value of our request, acknowledging that it "may have had merit [i]f the project was the first resort constructed near Lake Tahoe." But the County dismisses the necessity of the analysis here because the area is full of resorts like "Northstar, Heavenly Ski Resort, Homewood Ski Resort, Donner Ski Ranch, Sugar Bowl, [and] Boreal." FEIR at 3.2.4-546 (response no. 09-275). These are all *winter* resorts. The EIR should analyze the impact of this first-of-its-kind year-round resort on tourism-related growth in Tahoe, as it will assuredly escalate the "arms race" of attractions in the area.

12. The EIR's Analysis of Impacts to Public Services and Utilities Remains Inadequate.

06-42

The FEIR fails to correct the problems we identified in the DEIR's analysis of the Project's impact on public services and utilities. First, we commented that the DEIR must analyze the environmental impacts of constructing wastewater-detention facilities for the Project. These facilities would be constructed as mitigation for the Project's predicted overloading of the Truckee River Interceptor ("TRI"), and would hold sewage and release it slowly to avoid overwhelming the TRI. *See* DEIR at 14-36. Instead of correcting this deficiency, the County claims that "because the wastewater detention facility would be within the project site, the impacts would be the same as impacts from development of other parts of the project." FEIR at 3.2.4-546 (response no. 09-277).

However, merely being situated within the Project's footprint does not mean that the wastewater-detention facilities would have the same impacts as other aspects of the Project. Tanks full of sewage—whether installed above or below ground—pose unique environmental impacts that are not associated with any other aspect of the Project. For example, tanks could leak and cause ground or surface water contamination, yet the EIR provides no analysis of these potential impacts. Tanks holding sewage also

SHUTE, MIHALY & WEINBERGER LLP

require ventilation, and the EIR must disclose and analyze the impact on air quality—especially the odor impacts—of off-gassing from these sewage tanks. Despite our comments warning of this fatal deficiency in the DEIR, the FEIR nowhere identifies or analyzes the particular impacts of the new wastewater-detention facilities.

And to be able to adequately analyze the wastewater-detention facilities' impacts, the EIR must identify likely locations for the facilities and discuss the unique impacts that may arise in specific locations. For example, the threats posed by leaks or spills of sewage would differ in nature and severity based on the location of the tanks. Odors would have different impacts depending on how close the detention tanks are to areas frequented by people, and especially to sensitive receptors. Additionally, in some locations, impermeable underground tanks may intercept and block or divert groundwater flow. Without a description of the wastewater detention facilities, including locations, and without disclosure of the facilities' potential environmental effects, the EIR cannot pass muster. *See* CEQA Guidelines § 15126.4(a)(1)(D) (requiring that an EIR analyze the environmental impacts of mitigation measures).

Second, the FEIR fails to correct the DEIR's lack of an adequate analysis of the environmental impacts of constructing a new fire station, which would be necessary to mitigate the Project's impact on emergency services. DEIR at 14-44. Specifically, the EIR does not provide any substantive discussion of the impacts of building a fire station outside of the Project Area, stating only that the station's construction and operation "would have similar environmental effects to other relatively small development projects in Olympic Valley, including construction and operational traffic, air emissions, and noise." FEIR at 3.2.4-546 (response no. 09-278) (quoting DEIR at 14-44).

Identifying only the broad categories of possible impacts, like the EIR does here, is not a sufficient analysis of a mitigation measure's impacts. That CEQA allows a less-detailed impacts analysis for mitigation measures (*see* CEQA Guidelines § 15126.4(a)(1)(D)) does not give the County leave to reduce the level of detail in its "analysis" to be so vague that virtually no information about the possible impacts is discernable. If allowed to rely on such scant description, an EIR could not achieve its fundamental informational purpose, which requires that the agency make "a good faith effort at full disclosure." CEQA Guidelines § 15151.

Nor does the County's claim that this is a "programmatic" EIR eliminate its duty under CEQA to provide some analysis of an off-site fire station's environmental impacts. *See* FEIR 3.2.4-547 (response no. 09-278). As explained above in Part I.A(1), environmental review must be made at the earliest possible date. Certification of the EIR

SHUTE, MIHALY & WEINBERGER LLP

and adoption of the Specific Plan and associated requested approvals would grant entitlements to build the Village at Squaw Valley as described in the EIR and commits the County to a course of action that would result in the need for a new fire station, which may be built off-site. Accordingly, the County must disclose and analyze the impacts of an off-site fire station now, to the extent feasible.

O6-42 (cont.)

Third, the FEIR continues to underestimate the Project's potential significant impacts to recreational resources, such as existing backcountry hiking trails, from bringing thousands of new visitors and residents to the Olympic Valley. *See* FEIR at 3.2.4-454 (SMW letter, comment no. 09-280). The County claims that because the Project would comply with the Placer County General Plan's requirements for park space and other recreational opportunities, the Project would not cause substantial deterioration of existing recreational resources. FEIR at 3.2.4-547 (response no. 09-280). This is the sole basis for the EIR's determination that the Project would not have a significant impact on recreational resources.

O6-43

However, the General Plan's recreational requirements cannot account for all of the Project's demands on recreational resources. The scope of the General Plan's requirements for recreational opportunities are tied to the number of new *residents* a new development would bring to the area—*not* the number of tourists and other recreational visitors that it would bring. *See* DEIR at 14-42. Accordingly, the General Plan's requirements alone would not provide for the massive influx of non-resident visitors to the Olympic Valley that the Project promises. Further, unlike residents, who would only occasionally use recreational resources, tourists and visitors come to Squaw Valley *solely* to use recreational resources. This means that, on a per-capita basis, recreational visitors would have a greater impact on recreational resources than residents would. The EIR fails to explain how mere compliance with a County policy related to providing enough recreational resources for residents would somehow ensure that a massive influx of recreation-seeking visitors does not contribute to the deterioration of existing resources.

Compounding the Project's impact on recreational resources is the fact that the Project would "provide enhanced access to existing public amenities" and develop "picnic areas, . . . signage, trailheads, and new restrooms," making these resources easier to use and more attractive to users. *See* FEIR at 3.2.1-21 (response no. F2-2). But the EIR does not disclose the impacts of bringing more users to existing recreational resources like hiking trails. For example, the Granite Chief Trail—which has a trailhead in the Olympic Valley that the Project would develop with "parking, signage, and bike parking" (*id.*)—intersects with the Pacific Crest National Scenic Trail ("PCT"), (FEIR 3.2.1-9 (comment no. F2-3)). Commenting on the Project's potential to drive up use of

existing trails, the Forest Service warned that "[i]ncreased use of the PCT may affect recreational experience as well as degrade the trail itself which is not designed for such heavy use" and expressed concern that "[t]he potential impacts to the PCT are not addressed anywhere in the [EIR]." *Id.*

D6-43 (cont.)

Instead of analyzing the likely impacts that we and the Forest Service identified, the County attempts to downplay the Project's impacts on recreational resources by responding that the improvements to the Granite Chief Trailhead "would be for the sole purpose of providing safer access for hikers currently using existing trails." FEIR at 3.2.1-21 (response no. F2-3). Not only does this ignore the reality that better facilities would increase use, this directly contradicts the EIR's explanation *in the preceding paragraph* that the plan to provide more parking and better signage at the Granite Chief Trailhead would be part of the Project's development of "new and expanded public recreational facilities" to accommodate increased demand. FEIR at 3.2.1-21 (response no. F2-2). The County cannot have it both ways, simultaneously claiming that its improvements would provide sufficient recreational opportunities for a steep increase in visitors and asserting that those improvements would have no impact on existing trails like the PCT because they are merely intended to provide safer access for existing users.

Finally, the FEIR fails to correct the deficiencies we identified in the DEIR's cumulative-impacts analysis for public services and utilities. *See* FEIR at 3.2.4-454 – 455 (SMW letter, comment no. 09-281). Instead, the County claims that "[b]ecause[] the project would fully mitigate its impacts on public services, a significant cumulative impact would not occur." FEIR 3.2.4-547 (response no. 09-281). This is wrong for two reasons.

D6-44

First, some of the Project's contributions to cumulative impacts on public services and utilities would not be mitigated. Specifically, some of the Project's impacts would be less than significant, and mitigation is not required for these small impacts. This is exactly why CEQA requires that an EIR analyze small impacts like these that may alone be insignificant but would contribute to larger, cumulative impacts. *See* CEQA Guidelines § 15355(b) ("Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.").

For example, the EIR explains that the development of residential and commercial space "could increase demand for sheriff/police protection" and "[e]mergency response times [to the area] could increase due to increased calls for service, especially during peak periods" but determines these impacts would be less than

significant. DEIR at 14-45. These are small but very real impacts, and this is exactly what a cumulative-impacts analysis is designed to account for—but the EIR ignores these impacts. The EIR should also explain whether the Project's less-than-significant solid-waste generation impact might nonetheless contribute to a cumulatively significant impact on waste management in the area. *See* DEIR at 14-38. Likewise, the EIR should analyze the incremental contributions to cumulative impacts on recreational resources of the Project's purportedly less-than-significant impact on hiking trails and other recreational resources. *See* DEIR at 14-42 – 43.

06-44 (cont.)

Next, the information in the EIR does not support the County's claim that the Project would "fully mitigate" its impacts on public services and utilities. Mitigation measures need only to "minimize" significant impacts—not fully eliminate an impact. *See* CEQA Guidelines § 15126.4(a)(1). Accordingly, mitigated impacts may still contribute to cumulatively significant impacts. For example, the EIR concludes that its mitigation for impacts on wastewater collection "would reduce the potential impact to sewer capacity to a less-than-significant level." DEIR at 14-37. But there would still be some impact to the regional sewer system, and the EIR must therefore analyze this incremental contribution to cumulative impacts, or provide evidence that the Project would make no such contribution at all. *See* CEQA Guidelines § 15355(b). The EIR must similarly analyze the Project's contributions to cumulative impacts on fire and emergency services. *See* DEIR at 14-45.

13. The EIR Still Fails to Provide an Adequate Analysis of the Project's Energy Efficiency.

06-45

The County also failed to correct deficiencies in the EIR's energy-efficiency analysis. In our comment, we explained that the DEIR could not accurately evaluate the Project's energy efficiency by comparing its proposed energy consumption to existing developments in the area because true energy efficiency can be determined only by comparing the Project's energy demands to contemporary standards. FEIR at 3.2.4-455 (SMW letter, comment no. 09-284). In response, the County claims, perplexingly, that it need not make this comparison because "[t]he question, under CEQA, is whether a project would result in a wasteful or inefficient use of energy," FEIR at 3.2.4-548 (response no. 09-284). Actually, under CEQA, the question is whether a project would result in "wasteful, inefficient, and *unnecessary* consumption of energy." *Cal. Clean Energy Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 209 (emphasis added); *accord* CEQA Guidelines, Appx. F(I); *see also* CEQA Guidelines § 15126.4(a)(1) (mitigation measures should be used to mitigate "inefficient and *unnecessary* consumption of energy") (emphasis added). As we commented, the EIR

SHUTE, MIHALY & WEINBERGER LLP

fails to provide sufficient information to determine whether the Project is energy efficient by today's standards, which is essential to determining whether the Project would consume only the amount of energy *necessary*.

Further, the Project's compliance with Title 24 Building Code energy efficiency-standards does not establish that the Project, if built, would be energy efficient. *See Cal. Clean Energy*, 225 Cal.App.4th at 211. While the Building Code addresses energy savings for buildings themselves, it does not include other relevant energy-efficiency considerations like "whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope." *Id.*

The FEIR fails to adequately address comments relating to energy use associated with vehicular trips. We explained that the DEIR underestimated the extent of the Project's transportation energy impacts because it relied on an inaccurate estimate of the Project's vehicle miles traveled ("VMT"). FEIR at 3.2.4-456 (SMW letter, comment no. 09-286). The FEIR refers the reader to responses to comments 09-114 through 09-134 which in turn directs the reader to responses to letter 08-d. *Id.* at 3.2.4-549. Yet, the responses to letter 08-d seek to defend the faulty analysis in the DEIR. Consequently, the EIR continues to underestimate the Project's trip generation and VMT. For example, as we explain above in Part I.B(3)(a), the EIR substantially underestimates the number of trips that would be generated by the indoor water park. Once the EIR is revised to include an accurate estimate of trips that would be generated by the water park, it must revise its VMT estimates, and its analysis of the Project's transportation-related energy impacts.

We also commented that the EIR does not provide any discussion of appropriate renewable-energy options for the Project. FEIR at 3.2.4-456 (SMW letter, comment no. 09-288). The County responds that the proposed Specific Plan contains policies related to energy efficiency. FEIR at 3.2.4-550 (response no. 09-288). But these proposed policies merely "encourage" use of renewables and instruct that the Project applicant "explore" renewable options. DEIR at 14-26 – 27. First, these aspirational policies do not provide analysis of renewable-energy options that are actually viable for the Project, which is necessary for a good-faith analysis of the Project's energy efficiency. *Cal. Clean Energy*, 225 Cal.App.4th at 213. Further, the EIR should not just "encourage" or direct "exploration of" use of renewables—for the Project to truly aim to meet Appendix F's goal of "increasing reliance on renewable energy sources," the EIR should *require* use of renewable energy to the extent feasible. *See* CEQA Guidelines Appx. F(I)(3).

SHUTE, MIHALY & WEINBERGER LLP

The County also attempts to evade its obligation to provide a complete analysis of the Project's energy efficiency by claiming that specific analyses we requested were only suggested topics that Appendix F says "may" be discussed. *See* FEIR at 3.2.4-550 (response no. 09-289). That Appendix F does not require any particular discussion—instead listing topics that *may* be addressed as part of an EIR's energy-efficiency analysis—does not mean that the County is not obligated to make a good-faith effort to fully analyze whether the Project would result in an "inefficient, wasteful[, or] unnecessary consumption of energy." CEQA Guidelines, Appx. F(I); *see also* CEQA Guidelines § 15151 (requiring a "good faith effort at full disclosure"). Indeed, part of adequately informing the public and decision-makers about the Project's energy efficiency is to explain whether there are more energy-efficient methods for constructing the Project, as we indicated in our comment on the DEIR. *See* FEIR at 3.2.4-457 (SMW letter, comment no. 09-289). The EIR fails to do this.

D6-4/5 (cont)

The County's also brushes off our comment that the EIR erred in assuming that construction materials for the Project would be produced energy-efficiently. We pointed out the critical logical fallacy in the EIR's analysis, explaining that "[e]nergy-efficient and economically efficient are not always synonymous" because cheap and plentiful nonrenewable resources may encourage wasteful manufacturing. FEIR at 3.2.4-457 (SMW letter, comment no. 09-290). Not only does the County fail to correct that error, it takes the position that it need not make such an analysis because "[t]he applicant would not control the manufacturing process for materials used to construct the project." FEIR at 3.2.4-550 (response no. 09-290).

This excuse does not hold water. In almost no situation would the party constructing a building also manufacture the construction materials. However, the builder *does* control what materials it purchases, and the EIR can analyze the relative energy-efficiency of potential materials. Indeed, Appendix F contemplates just such an analysis. *See* CEQA Guidelines, Appx. F(II)(C)(1) ("If appropriate, the energy intensiveness of materials may be discussed.").

Finally, the FEIR fails to adequately address our comment that the DEIR did not conduct the required comparative evaluation of whether any Project alternative would result in more or less energy use. *See* FEIR at 3.2.4-457 (SMW letter, comment no. 09-291). The County responds that comparative energy consumption of the alternatives is discussed in Chapter 17 of the EIR. FEIR at 3.2.4-550 (response no. 09-291). It is not.

SHUTE, MIHALY & WEINBERGER LLP

06-416

14. The EIR's Cumulative Impacts Analysis Remains Inadequate.

The FEIR's failure to adequately analyze the Project's cumulative impacts is discussed throughout this letter and the firm's letter on the DEIR in conjunction with each environmental issue area. However, the FEIR also fails to include, as requested by Sierra Watch and many other commenters, an adequate analysis of the Project's impacts in conjunction with probable future and concurrent projects, such as the Martis Valley pipe (Project 60), the base-to-base gondola, and White Wolf.[23] The response to comments points the reader to the Master Response regarding cumulative impacts. FEIR at 3.2.2-550 (response to comment nos. 09-294–09-295). However, the Master Response does not mention the Martis Valley pipe at all. It does claim that cumulative projects were limited to those under review before the "cut off" set by the County, which is the time of the NOP (here, February 2014). As noted in the firm's comments on the DEIR, the Squaw Valley Public Services District proposed its water project (to deliver water from Martis to Squaw) as part of the Tahoe Sierra Integrated Water Management Plan in December 2013, before the alleged "cut off." *See* FEIR at 3.2.4-345 (SMW comment letter, comment no. 09-17, and Exhibit 8 thereto).

The FEIR claims the base-to-base gondola and White Wolf did not meet the County's "cut off" and therefore were not probable future projects under CEQA. As explained above (*supra*, Part I.A(2)) this argument is specious as the gondola is proposed by the same applicant as the Project and will be used to connect Squaw and Alpine, resorts under common ownership. Furthermore, the applicant has been in frequent communication with the owner of White Wolf over the gondola project and the proposed development at that site. *See* Exhibit 24 (Squaw Magazine article re Troy Caldwell). The EIR may not use a cut off date that clearly excludes known projects in the pipeline in the immediate vicinity of the Project.

The FEIR nevertheless attempts a brief analysis of the gondola (but not White Wolf). *See* FEIR at 3-64–365. This does not come close to meeting CEQA's standards, as it neglects to even mention, much less analyze, many potential significant impacts. This includes impacts to biological, recreational, and visual resources from the placement of the gondola in a wilderness area that is home to the Sierra Nevada yellow

[23] As discussed (*supra*, Part I.A(2)), the gondola and Project 60 are so intertwined with the Project that they should have been analyzed as part of the Project. At a bare minimum, however, the EIR must analyze them as cumulative projects.

O6-46 (cont'd)

legged frog, as well as air quality and growth inducing impacts from the facilitation of more visitors to the area and the development at White Wolf. *See* Exhibit 25.

A revised and recirculated DEIR must thoroughly analyze the Project's cumulative impacts in conjunction with the above referenced projects.

C. The FEIR Fails to Correct the Deficiencies in the DEIR's Alternatives Analysis.

1. The FEIR Fails to Provide a Reasonable Range of Alternatives.

O6-47

In our prior comments, we informed the County that the DEIR failed to evaluate a reasonable range of alternatives to the whole Project. FEIR at 3.2.4-458–3.2.4-461. In response, the FEIR all but admits that two of the alternatives evaluated in the DEIR are not true alternatives to the Project, as they apply to narrow components and would increase the Project's environmental impacts. *See* FEIR at 3.2.4-554 (response to comment no. 09-302, failing to defend "Squaw Valley Road" alternative), 3.2.4-55 (response to comment no. 09-303, acknowledging that "the Alternative Tank Location was evaluated due to the uncertainty of the project applicant to reach agreement on purchasing land encompassing the proposed tank site.")

Furthermore, two additional alternatives evaluated in the DEIR are "no project" alternatives, and one focuses on protection of historic resources. Contrary to the FEIR's claims, the EIR's one remaining alternative does not constitute a "reasonable range" of alternatives under CEQA.

2. The FEIR Fails to Demonstrate the Infeasibility of Less Impactful Alternatives.

Although Sierra Watch and numerous other commenters requested that the EIR evaluate a version of the proposed Project without the indoor waterpark, the FEIR still refuses to do so. Instead, the FEIR claims the indoor waterpark is necessary to "provide a comprehensive, world-class, family resort experience to be competitive on an international stage."[24] FEIR at 3-75. The FEIR similarly indicates that the Reduced

[24] The FEIR also continues to insist that removal of the indoor water park would not result in a substantial reduction in environmental impacts. This is partly because, as explained above, the EIR severely understates the Project's impacts, including those generated by the indoor water park (*e.g.*, traffic).

Density Alternative "may not meet project objectives for Squaw Valley to be on par with peer world class North American ski destinations." FEIR at p. 3-62. Yet, the FEIR provides no evidence that an indoor water park is necessary to make Squaw a world-class resort, or that any/all other competitor resorts have such indoor water parks. Indeed, Squaw Valley does not need *any* new development, much less the mass-scale development proposed in conjunction with the Project, to be competitive as a world class resort. Indeed, Squaw Valley was recently voted the Number 1 Ski Resort in North America by USA Today, and was also selected by the US Ski Team as a host site for the proposed March, 2017 FIS Alpine World Cup. *See* Exhibit 26.

O6-47

Furthermore, the FEIR fails to provide any information regarding the feasibility of the alternatives presented in the EIR, and most notably the reduced density alternative that appears to be feasible and would reduce Project impacts. This includes a failure to provide the requested financial feasibility data for the various alternatives, even while the FEIR admits that a financial consultant has prepared this analysis and submitted it to the County. The County should not delay in making this information available to the public, as it is critical that the public review any evidence the County may rely upon in making its feasibility determination. As noted in our letter on the DEIR, the County cannot approve the Project as proposed if there is a feasible alternative that would substantially lessen the Project's significant impacts. Pub. Res. Code § 21002. An alternative need not meet every Project objective or be the least costly in order to be feasible. *See* CEQA Guidelines § 15126.6(b).

D. The FEIR Must Be Recirculated.

O6-48

The firm's comments on the DEIR set forth CEQA's standard for recirculation. FEIR at 3.2.4-462 (comment no. 09-306) (citing CEQA Guidelines § 15088.5). The FEIR recognizes, as it must, that this is the correct standard, but asserts the standard has not been met here. FEIR at 3-109–3-111. The FEIR is incorrect. As demonstrated throughout this letter, Sierra Watch and others have presented information that reveals either new or more severe significant environmental impacts, or potentially feasible mitigation measures or alternatives to lessen these impacts, that have not been subject to review and comment in a DEIR. The County must revise and recirculate the DEIR to include proper analysis and mitigation of all the Project's significant impacts. Otherwise, approval would be illegal under state law.

SHUTE, MIHALY
& WEINBERGER LLP

II. APPROVAL OF THE PROJECT WOULD VIOLATE THE STATE PLANNING AND ZONING LAW AND THE SUBDIVISION MAP ACT.

The State Planning and Zoning Law and the Subdivision Map Act require that development decisions be consistent with the jurisdiction's general plan. As reiterated by the courts, "[u]nder state law, the propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, "[t]he consistency doctrine [is] the linchpin of California's land use and development laws; it is the principle which infuses the concept of planned growth with the force of law." *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336.

06-46

For the reasons described in Part ## of this letter, the Project is inconsistent with the Placer County General Plan and the Squaw Valley General Plan and Land Use Ordinance. Because of the Project's glaring inconsistencies with these planning documents, approval of this Project would violate State Planning and Zoning Law and the Subdivision Map Act.

III. CONCLUSION

In sum, the EIR is legally inadequate and cannot serve as the basis for Project approval. Further, the Project is inconsistent with key planning policies for the region. For these reasons, Sierra Watch respectfully requests that the Planning Commission recommend denial of the Project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Amy J. Bricker

Amy J. Bricker
Laurel L. Impett, AICP, Urban Planner
Laura D. Beaton

SHUTE, MIHALY
& WEINBERGER LLP

cc:

Tahoe National Forest	Joanne Roubique District Ranger Tahoe National Forest
Tahoe Regional Planning Authority	Joanne Marchetta Executive Director
Army Corps of Engineers	Leah M Fisher Senior Project Manager California North
California Office of the Attorney General	CEQA Enforcement Division
California Department of Water Resources	Ed Wilson Director of Public Affairs
California Department of Natural Resources	Johnathan Laird Natural Resources Secretary
California State Office of Historic Preservation	Julianne Polanco State Historic Preservation Officer
Department of California Highway Patrol Truckee Area	Ryan Stonebraker Captain
CalTrans	Kevin Yount Regional Planning Liasion and Intergovernmental Review
Lahontan Regional Water Quality Control Board	Laurie Kemper Lahontan Regional Water Board Ombudsman
Town of Truckee	Tony Lashbrook Town Manager
Nevada County	Brian Foss Planning Director
Squaw Valley Mutual Water Company	John Johnson President
Squaw Valley Public Service District	Mike Geary General Manager
North Tahoe Fire Protection District	Michael S. Schwartz Fire Chief
Friends of Squaw Valley	Friends of Squaw Valley Steering Committee
Truckee River Watershed Council	Lisa Wallace Executive Director

SHUTE, MIHALY & WEINBERGER LLP

Friends of the West Shore	Susan Gearhart President
Sierra Nevada Alliance	Peter Van Zant Executive Director
Center for Biological Diversity	Jenny Loda Amphibian and Reptile Staff Attorney
The League to Save Lake Tahoe	Darcie Goodman Collins Executive Director
Tahoe Area Sierra Club	Cindy Ochoa Chapter Chair
Mountain Area Preservation	Alexis Ollar Executive Director
North Tahoe Protection Alliance	Anne Nichols President
KSL Capital Partners	Bryan Elliot Senior Vice President
Squaw Valley Ski Holdings	Andy Wirth President
Squaw Valley Real Estate	Chevis Hosea Vice President of Development

Exhibits:

Exhibit 1	"Squaw Valley chief faces community opposition to expansion." B. Branan. Sacramento Bee. April 19, 2016.
Exhibit 2	"The Gondola That Will Change California Skiing Forever." P. Tolme.; "A Gondola To The 21st Century." D. Cox; "Two Mountains, One Link." M. Michelson; "Not-So-Secret Stash." I. Backstrom. 2015-16. *Squaw Magazine*
Exhibit 3	Alpine Meadows/Squaw Valley Base to Base Gondola Initial Project Application. J. Spenst.
Exhibit 4	Notice of Preparation of a Draft Environmental Impact Report for the Proposed Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. County of Placer. April 22, 2016.
Exhibit 5	USFS Notice of Proposed Action
Exhibit 6	Alpine Meadows Master Plan. SE Group. March 2015.

SHUTE, MIHALY & WEINBERGER LLP

Exhibit 7	"Fugitive Dust Emissions from Paved Road Travel in the Lake Tahoe Basin." D. Zhu, H. Kuhns, S. Brown, J. Gillies, V. Etyemezian, and A. Gertler. *Air & Waste Management Association.* 59: 1219-1229 (2009).
Exhibit 8	North Lake Tahoe Town Centers - Economic Development Incentives Program and Implementation Plan. Economic & Planning Systems Inc. November 2015.
Exhibit 9	"Sustainability in the Field: Lake Tahoe Hospitality and Environmental Protection." E. Leeming, D. Hansen, M. Alavosius, and D. Reimer, *Behavior and Social Issues*, 22, 21-39 (2013).
Exhibit 10	Review of Final Environmental Impact Report for the Village at Squaw Valley Specific Plan. T. Myers. June 10, 2016.
Exhibit 11	California Climate Science and Data for Water Resources Management. Ed. E. Lynn. California Department of Water Resources. July 2015.
Exhibit 12	"Is Tahoe Broken?" M. Clark, *SnowBrains.com*, January 23, 2015.
Exhibit 13	Chart Book: The Legacy of the Great Recession, Center on Budget & Policy Priorities, July 29, 2016.
Exhibit 14	Red Wolf Lodge at Squaw Valley. Reservations.com. July 19, 2016.
Exhibit 15	Squaw Valley Public Service District Board of Directors Meeting Minutes. #803. July 28, 2015.
Exhibit 16	Squaw Valley Public Service District. Comments on Final EIR – Village at Squaw Valley Specific Plan. M. Geary. May 6, 2016.
Exhibit 17	Squaw Valley Public Service District. Comments on Final EIR – Village at Squaw Valley Specific Plan. P. Bansen. May 6, 2016.
Exhibit 18	Letter re Mountain Adventure Camp Trip Generation Estimate Village at Squaw Valley Specific Plan, Placer County, California. N. Liddicoat, MRO Engineers. May 25, 2016.
Exhibit 19	"Spike in dead trees adds to fire danger." K. Alexander, *San Francisco Chronicle*, May 18, 2016
Exhibit 20	CEQA Handbook, Appendix E-1 (Preparing a Health Risk Assessment for Land Use Projects). Placer County Air Pollution Control District.
Exhibit 21	"Announcing Nonstop Flights From Atlanta to Squaw Valley on Delta Airlines." A. Wirth, April 29, 2016.
Exhibit 22	"Using a Digital SLR Camera to Monitor Light Pollution." Z. Kollath. Dark Skies Awareness IYA2009 Cornerstone Project.
Exhibit 23	California Historical Landmarks By County. California State Parks Office of Historic Preservation. http://ohp.parks.ca.gov/?page_id=21387
Exhibit 24	"The Human Link." J. Daley. *Squaw Magazine.* 2015-16.

SHUTE, MIHALY & WEINBERGER LLP

Exhibit 25	Letter re Scoping Comments on the EIR and EIS for the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. A. Bricker, L. Beaton, and L. Impett. May 23, 2016.
Exhibit 26	"Squaw Valley Proposed for 2017 World Cup." USSA. usskiteam.com. March 24, 2016.

785037.7

SHUTE, MIHALY & WEINBERGER LLP

06

Sierra Watch
Tom Mooers, Executive Director
August 2, 2016

06-1 This comment is a summary of the variety of topics addressed in detail in the remainder of the comment letter. Please see responses to the more detailed comments on each of these issues, responses to comments 06-2 through 06-48.

06-2 The comment states that the FEIR does not correct the DEIR's incomplete description of the project and the project setting. Specifically, the comment suggests that a project-level EIR should have been prepared rather than a programmatic EIR to describe the project in sufficient detail to allow meaningful evaluation of the project's effects rather than deferring such analysis. This issue was addressed in detail in responses to comments 09-4 through 09-15 in the FEIR. Contrary to the commenter's statements, the EIR does not improperly defer analysis. The comment describes perceived deficiencies in the DEIR and FEIR conceptually, but provides no specifics that can be responded to. Concerns with the description of sewage infrastructure and the level of biological resources surveys are identified; however, again, no specific reasons for a perceived deficiency are identified. Also, see response to comment 09-59 in the FEIR regarding the programmatic nature of the DEIR, including the project description. More detailed responses are provided below to comments that raise specific issues in the EIR.

06-3 The comment states that the FEIR cannot justify the improper piecemealing of the project. This issue was addressed in responses to comments 09-16 and 09-17 in the FEIR. Contrary to the commenter's statements, the proposed Village at Squaw Valley Specific Plan project is separate from the proposed Gondola project to connect the Alpine Meadows ski area to the Squaw Valley ski area and the Public Service District's proposed redundant water supply project to provide a source of emergency backup water supply to Olympic Valley, as described in responses to comments 09-16 and 09-17 in the FEIR. Although the comment expresses disagreement with the responses provided in the DEIR, it provides no evidence to indicate that these responses are inadequate. The comment provides no evidence contradicting the basic point that the VSVSP and the Gondola project have separate utility, in that the VSVSP would (if approved) proceed without the gondola, and the gondola would (if approved) proceed without the VSVSP.

The comment identifies the proposed Gondola project as being included in the Alpine Meadows Resort Master Plan (Master Plan), and therefore should have been considered in the DEIR cumulative impact analysis. This Master Plan is prepared and updated on an ongoing basis as a condition of Alpine Meadows' Special Use Permit (SUP) with the U.S. Forest Service (USFS). Much of the Alpine Meadows Ski Resort is located on National Forest System (NFS) land and is operated under the authorization of the SUP. The Master Plan is intended, in part, to keep the USFS apprised of future projects that are being considered on lands covered by the SUP. Further, as stated in the comment, the gondola was added to the Alpine Master Plan in March 2015. This is three years after initiation of the VSVSP and release of the NOP. Release of the NOP is considered the baseline upon which the impact of the project, including cumulative development, is based. See CCR Section 15125(a) and *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61. The CEQA process cannot re-start every time a new related project is proposed, or the process would never be completed. Because the gondola was proposed well after the initiation of the VSVSP EIR, it need not be included in the analysis of cumulative impacts

The comment suggests that the County analyze this overarching plan (i.e., the connection and combination of Squaw Valley and Alpine Meadows) as well as the water supply for the project in one document. However, for the reasons discussed under responses to comments O9-16 and O9-17 in the FEIR, the EIR analysis adequately evaluates the project; no changes to the DEIR are necessary.

06-4 The comment suggests that the FEIR did not evaluate impacts of the project in the Tahoe Basin and ignored Tahoe Regional Planning Agency (TRPA) environmental thresholds, but then critiques the manner in which the FEIR addressed TRPA environmental thresholds. The comment misstates how the FEIR addressed TRPA thresholds.

As explained in Section 3.1.15 of the FEIR, lead agencies under CEQA are required to determine the significance thresholds they use ("The determination of what thresholds of significance to apply and whether an impact of a project is significant remains within the independent review and discretion of the lead agency under CEQA. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved.") (CEQA Guidelines Section 15064," FEIR at page 3-87).

Section 3.1.15 goes on to explain how impacts to the Tahoe Basin associated with the project are addressed in the FEIR—including the use of TRPA thresholds for traffic and VMT.

While the comment sites case law with respect to the need to consider environmental impacts in an EIR (reference to the Protect the Historic Amador Waterways case), this comment does not identify specific impacts that the commenter believes are not addressed. Please see the other responses to this comment letter.

06-5 The comment claims that the FEIR did not "take into account" the Tahoe Basin's carrying capacity and failed to analyze/adopt mitigation (or alternatives) that would reduce significant impacts to the Basin.

The comment first states that VMT from the project was not considered properly because it underestimates VMT from the project that would occur in the Basin. No substantiation is provided that the VMT is an underestimation. Specifically, the comment suggests that the VMT contribution to the Tahoe Basin may be underestimated because the commenter believes the percentage of trips entering/exiting the Tahoe Basin is greater than the estimation of 41 percent used in the VMT calculation. The proportion of summer daily trips that enter/exit the Tahoe Basin is based on a survey of the trip origins and destinations of Village at Squaw Valley visitors and employees (see Table 9-14 of DEIR) and the proportion of total project trips made by each group type over the course of a day. The commenter offers no details in support of the assertion that the analysis to develop the 41 percent value is incorrect or insufficient.

The comment claims the FEIR did not determine the cumulative VMT from the project and other development in and around the Basin. Please see response to comment R1-3 and the Master Response regarding Project-Generated Vehicle Mile Traveled in the Tahoe Basin in this document. With regard to VMT and the effect of the project on Lake Tahoe, please see pages 3-25 through 3-26 and 3.2.4-117 through 3.2.4-118 of the FEIR, as well as the Master Response regarding Project-Generated Vehicle Mile Traveled in the Tahoe Basin in this document.

Regarding the TRPA "threshold" of 200 daily trips, traffic is not one of the carrying capacity thresholds adopted by TRPA for the Lake Tahoe Region (see TRPA Resolution 82-11[1]). TRPA defines 200 daily trips as a "significant increase" in Chapter 65 of its Code of Ordinances, and this requires preparation of a technical traffic and air quality analysis, including mitigation, for TRPA (see Chapter 65.2.5). While this is a TRPA requirement, it is not applicable to the proposed project for the reasons explained in Section 3.1.15 of the FEIR. Nevertheless, and as explained in Section 3.1.15 of the FEIR, the VSVSP FEIR evaluated traffic and air quality impacts, including in the Basin (see Chapters 9 and 10 of the DEIR, as modified by the FEIR). Extensive mitigation for both traffic and air quality impacts, including expansion of transit service that would reduce traffic impacts to the Basin, are included in the DEIR, and supplemented by the FEIR (see, particularly, pages 3-27 and 3-28 of the FEIR).

With regard to alternatives, several alternatives that would reduce traffic and air quality impacts are included in the EIR; however, the EIR does not "adopt" alternatives; rather, it describes alternatives and their effects. It is the discretion of the County Planning Commission and Board of Supervisors to consider the project and its alternatives, as presented in the EIR, and decide whether the project or an alternative should be approved.

The comment provides assertions of inadequacies, but does not discuss the FEIR conclusions with regard to the issues raised in the comment, or provide any evidence that the analysis is not adequate.

Finally, the comment states that this project would use "up to 40% of the Basin's remaining VMT" and that this indicates "significant impacts that must be analyzed in the EIR." As explained in the Master Response in this document addressing Project-Generated Vehicle Miles Traveled in the Tahoe Basin, cumulative development would not be expected to result in a VMT higher than the TRPA VMT threshold. Further, the comment does not acknowledge that the project is consistent with development densities permitted by Placer County's Squaw Valley General Plan and Land Use Ordinance (SVGPLUO), which has been in effect since 1983, and if approved would develop at a density of approximately 50 percent of the SVGPLUO holding capacity applicable to the project area. If the project is approved and built, and if that results in "consuming" available VMT in the Tahoe Basin such that some projects in the Basin would not be approved so that the Basin remains under TRPA's VMT threshold, it is difficult to translate that into a significant effect on the environment. Regardless, it appears, as explained in the VMT Master Response, that planned development in the Basin would not be hindered, based on cumulative VMT considerations. However, this response informs the Placer County Board of Supervisors that its approval of the VSVSP could ultimately limit approval of project in the Basin by the County, TRPA, and other land use agencies overseeing development in the Basin. See, also, response to comment O2-9 in this document.

06-6 The comment states that the FEIR does not support the occupancy assumptions used in the EIR, and claims the FEIR relied on outdated occupancy data. As described in Section 3.1.11 of the FEIR, occupancy assumptions are based on 13 years of data (2002-2014) for comparable projects across North America. Comparability is important, as it considers product type, product pricing, etc. In other words, it would not be appropriate to compare a resort project such as VSVSP to a motel, any more than it would be appropriate to apply data regarding turnover and orders at a fast food restaurant to a formal sit-down restaurant. The analysis provided in the DEIR, supplemented by further information provided in FEIR, provides appropriate evidence to substantiates the conclusions in the document.

[1] Tahoe Regional Planning Agency. 2012. Resolution 82-11. Available: http://www.trpa.org/wp-content/uploads/Resolution-82-11_12-2012.pdf. Accessed September 2016.

The commenter suggests that other data is available that suggests higher occupancy should be assumed. One piece of data is cited from a report, *Economic Development Incentives for North Lake Tahoe Town Centers*[2]. This report shows a range of occupancy of 70 to 73 percent for overnight accommodations in Squaw Valley for 2012-2014. The problem with this information is twofold:

1. It is a very limited period of time, including partial year data for 2012 and 2014.

2. The data, which is not explained, would likely have included Red Wolf Lodge, which as explained on page 3-70 of the FEIR is a low priced property, not comparable to the project, and which has seen a 75 to 100 percent annual occupancy at the same time (2008-2014) more comparable (to the project) facilities saw annual occupancies of 34.7 to 55.1 percent.

Regarding the data used in an EIR for a project in South Lake Tahoe, Placer County has not reviewed that EIR, nor need it do so. Rather, the FEIR is clearly based on substantial evidence in the record which clearly and transparently demonstrates the assumptions used in the FEIR reflect a reasonably foreseeable occupancy (and also includes a margin of error; see pages 3-70 and 3-71 of the FEIR).

Regarding the question as to what relevant issues relied on this data:

- Land Use and Forest Resources: relied on buildout of the project; occupancy was not a factor.

- Population, Employment, and Housing: this information was informed by the occupancy factor, which helps determine overall employment for the project and this, in turn, informed employment-related population and housing demand information.

- Biological Resources: relied on buildout of the project and occupancy was not a factor, with the exception of resources that could be affected by groundwater use; this data is influenced by water consumption which is based on annual occupancy.

- Cultural Resources: relied on buildout of the project; occupancy was not a factor.

- Visual Resources: relied on buildout of the project; occupancy was not a factor.

- Transportation and Circulation: assumed full occupancy/peak days.

- Air Quality: operational impacts assumed full occupancy/peak days.

- Noise: operation impacts assumed full occupancy/peak days.

- Soils, Geology, and Seismicity: relied on buildout of the project; occupancy was not a factor.

- Hydrology and Water Quality: relied on buildout of the project for resources that would be affected by occupation and use of the project, with the exception of resources that could be affected by groundwater use; this data is influenced by water consumption which is based on annual occupancy.

[2] Placer County. 2015 (February). *Economic Development Incentives for North Lake Tahoe Town Centers. Hearing Report.* Prepared by Economic & Planning Systems, Inc. with Joe DeCredico Studios.

- Public Services and Utilities: relied on buildout of the project for resources that considered an annual demand, such as water, but considered peak occupancy for resources that address peak demand, such as peak flows for sewer infrastructure.
- Hazardous Materials and Hazards: relied on buildout of the project; occupancy was not a factor.
- Greenhouse Gases and Climate Change: relied on annual occupancy assumptions in the calculations of various emission sources, such electrical usage.

The application of occupancy assumptions is either identified in the Methods and Assumptions section of each chapter, information provided in appendices describing analysis methods and assumptions, or in documents and reports used to support the EIR impact analysis and cited in the chapter text and provided in the administrative record.

06-7 The comment references a "Myers Report" provided as Exhibit 10 with this comment letter. The "Myers Report" is responded to in this document as Letter 06.10. This comment letter summarizes or reiterates many of the items presented in Letter 06.10. See response to comment letter 06.10.

The comment states that the FEIR does not remedy the DEIR's failure to adequately analyze and mitigate the project's impacts on water supply, hydrology, and water quality. The comment also references comments provided by Sierra Watch, the Lahontan Regional Water Quality Control Board, the Squaw Valley Public Service District, and the Squaw Valley Mutual Water Company on this topic. See the following responses to comment letters in the FEIR (in the order they are referenced by the commenter): 08, S4, L4, and L3.

The commenter's previously submitted comments related to the project's impacts on water supply and hydrology/water quality are adequately addressed in responses to comments 09-23 through 09-56 and 09-95 through 09-113, respectively, in the FEIR. Many of these responses refer to the Master Response in the FEIR addressing water supply, which directly addresses issues provided in this comment letter. Much of the comment relates to the consideration of climate change on water supply. In summary, and as conveyed in the DEIR, FEIR, and WSA, a key element effecting groundwater conditions in the Olympic Valley is the timing of precipitation each year. Although there are climate change models that may project possible changes in the volume or type of precipitation, there are none that address timing of precipitation. Therefore, to project effects of climate change on groundwater conditions in the Olympic Valley beyond what is already provided in the EIR and WSA would require significant speculation and conjecture not appropriate for either of these documents. The comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here. Also, see the Master Response in the regarding recirculation in the FEIR.

06-8 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. Although the comment expresses disagreement with the methods used to model changes in flows in Squaw Creek, it provides no alternative method for obtaining information on this topic and therefore provides no evidence that it is not the best information available. The comment contends that the effects of the VSVSP on the projected flows in Squaw Creek are underestimated and are not supported by substantial evidence. Refer to the responses to comment letter 08a in the FEIR for responses to these claims. Specifically, the comment indicates that revisions to the water supply assessment (WSA) that analyzed higher occupancy rates and increased water demand provided in the FEIR were not carried forward into the analysis of effects to the flows of Squaw Creek. This is incorrect. For analysis of the effects of groundwater pumping on biological resources using the assumptions of the 2015 WSA, refer to the Master Response regarding water supply in

the FEIR (pages 3-13 through 3-14). As discussed in the Master Response regarding water supply and indicated in response to comment 08-50 in the FEIR, additional analyses based on the updated 2015 WSA did not change the anticipated effects on the refugia habitat provided by Squaw Creek.

The comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

06-9 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. Specifically, the comment asserts that the response to comment 08a-36 in the FEIR is incomplete because details (including the quantity of water that would be pumped, dewatering procedures, and the frequency of dewatering) are not provided. The comment also contends that the response to comment 09-97 should include a description of the precise permit conditions that would apply to this project. As indicated in the DEIR (page 13-48), "each construction phase of the proposed project would have discrete permits and stormwater management requirements consistent with all federal, state, and local laws applicable at the time." As described elsewhere in this document, because this is a program EIR evaluating the concepts presented in a plan for the overall development of Squaw Valley, the suggested details such as the quantity of water pumped are not available, nor are they necessary for reaching informed decisions on the plan. In fact, these details would not be realistically available for virtually any project level EIR, nor are they needed to complete the impact assessment. Construction dewatering is influenced by the timing of construction, precipitation, the specific dewatering methods approved by the Lahontan RWQCB, which would authorize the work, and other factors. Any estimates related to quantity of water pumped or frequency of dewatering would be purely speculative. In addition, such information is not needed for an impact assessment if the need for dewatering, and parameters (e.g., regulations) for the proper implementation of dewatering and treatment and disposal of pumped water are identified.

As noted by the commenter, Mitigation Measure 13-2b: Implement additional construction protection measures, includes a requirement to prepare a construction dewatering and discharge plan that would be submitted to the Lahontan RWQCB for approval prior to initiating any excavation activities (see DEIR page 13-51). The mitigation measure requires that the Dewatering/Diversion plan includes the following details: location of the discharge area or outfall and name of receiving water; a description of the discharge or diversion method and plan drawings; the frequency and estimated volume and rate of discharge; expected pollutants and concentration in discharge, and control measures to be applied and maintained for pollutant control; and planned effluent and/or receiving water monitoring (visual and other). The comment appears to imply a lack of confidence in the ability of the Lahontan RWQCB to regulate construction dewatering, construction stormwater management, and related activities in a manner that is adequately protective of water quality. As indicated in response to comment 08a-36, the analysis of dewatering impacts is qualitatively based on the understanding that dewatering would be limited to instances when groundwater is relatively high during construction of parking structures and during instream work. The approval process for the dewatering plan would serve to quantify and verify these assumptions.

06-10 The comment states that the DEIR's evaluation of the impacts of groundwater pumping on interactions between groundwater and surface water was flawed. In summary, the comment reiterates comments provided on the DEIR and conveys disagreement with the responses on the FEIR, but provides no new information, other than referencing a letter from Tom Meyers. See response 09-98 in the FEIR, which adequately addresses the issues that are re-raised (note that response to comment 09-98 references responses to comment 08a-47 and 08a-

48). Regarding the reference to the attached letter submitted by Tom Myers, see responses to comment letter 06.18 in this document.

06-11 The comment reiterates previously submitted comments related to the project's potential impacts on Truckee River water quality, and states that this comment was not adequately addressed in the FEIR. Specifically, the comment asserts that while Truckee River streamflow was addressed (see response to comment 09-56 in the FEIR), Truckee River water quality was not. See, however, response to comment 09-92 in the FEIR, which states:

> The comment states that the cumulative effects analysis for fish and aquatic species did not account for contribution to the cumulative degradation of the Truckee River's water quality and affects to aquatic species in the Truckee River. See response to comments I319-4 and L1-4, the portion of the water supply Master Response related to effects on the Truckee River, and response to comment 09-56. The proposed project would not have adverse effects on the Truckee River related to water volume or quality, and therefore would not have an adverse effect related to fish.

The referenced portions of the FEIR (especially response to comment L1-4) adequately address Truckee River water quality impacts resulting from the project.

06-12 The comment states that mitigation measures proposed in the FEIR do not ensure that significant impacts from groundwater pumping will be avoided. The comment refers to Mitigation Measures 6-1c and 13-4, as revised in the FEIR, and states that mitigation is improperly deferred. The issue of deferred mitigation associated with Mitigation Measure 13-4 is adequately addressed in responses to comments 09-49. The comment focusses on Mitigation Measure 6-1c, but Mitigation Measure 6-1c is directly connected to Mitigation Measure 13-4, as well as the other mitigation measures associated with Impact 6-1. To consider Mitigation Measure 6-1c in isolation ignores the suite of related mitigation measures that together provide a comprehensive response to the potential environmental effect. For the reasons described in those responses, Mitigation Measures 6-1c and 13-4, as revised in the FEIR, are not improperly deferred. The implication in the comment that the discussion of Impact 6-1 and associated mitigation measures defers identification of impact significance is incorrect. The "potentially significant" conclusion is a conclusion of significance; there just is not currently sufficient information to be certain that a significant impact would occur. Mitigation Measures associated with Impact 6-1 require the collection of sufficient information to confirm whether the described significant impact does occur, and provides a course of action to reduce the significant impact if evidence is found that conditions described under Impact 6-1 occur.

Regarding the comment that the County cannot rely on the SVPSD to ensure implementation of Mitigation Measure 6-1c, see response to comment L3-1 (submitted by Mike Geary of the SVPSD) in this document. As stated therein, the SVPSD's requested text changes and modifications [concerning the responsible party for mitigation] have been incorporated into the DEIR and FEIR Errata Sheet (Revised 8-5-16) since publication of the FEIR. The responsible party for ensuring Mitigation Measure 6-1c is implemented will be the project applicant, but the SVPSD may elect to work with the applicant on this matter.

06-13 The comment states that the FEIR does not correct the DEIR's failure to consider the project's contribution to cumulative impacts on water quality in the Truckee River (as previously stated in comment 09-113 in the FEIR). See response to comment 06-11, above, regarding Truckee River water quality. This topic was adequately addressed in the FEIR.

06-14 The comment reiterates a comment provided on the DEIR and expresses an opinion that the responses provided are not sufficient. The comment indicates that the results of "full surveys" of the area's biological resources are necessary for the public and decision-makers

to make an informed decision about the specific plan. The comment does not define "full surveys," nor does it identify why the surveys used in the EIR are not adequate to support the programmatic level of analysis.

As indicated in response to comment 08b-34 in the FEIR, in those areas where surveys were not conducted at a level required to procure permits, the analysis was based on reconnaissance–level surveys, review of aerial photography and, in the case of potential trails, informed estimates of the types of sensitive resources that may be affected based on habitat type, reports of sensitive species sightings, and other data. The DEIR also included performance standards as part of the mitigation requirements to demonstrably reduce potential impacts to sensitive habitats, if impacts were to occur. Thus, the DEIR did not defer analysis of impacts or mitigation measures; instead, it conducted various surveys and employed other tools to identify potential resources, determine if they may be affected, and developed mitigation as needed for those areas of know impacts. See also responses to comments 09-59 and 09-60 in the FEIR.

As indicated in response to comment 09-60 in the FEIR, the mitigation requires a more detailed definition of the boundaries of wetland features and adherence to performance standards and permit conditions attendant on the delineation process. This is not deferral of mitigation; the measures are clearly laid out and the actions and outcomes following the results of further data collection are clear. Furthermore, regulatory requirements include survey protocols for these additional surveys, which aid in calculating the effect of development for the purposes of issuing permits required by the wildlife agencies for potential effects on special-status species. Among the requirements for these surveys is often a limitation on how far in advance the surveys are conducted and short lifespans in which the data can be relied upon. The need to sometimes collect further information after an EIR is complete is well established in CEQA, particularly for program EIR evaluations of plan level documents.

The comment cites several court cases that do not appear to directly correlate to the comment. In the *Citizens of Goleta Valley v. Board of Supervisors of the County of Santa Barbara* case, the court considered whether an EIR for a proposed shore-front resort hotel failed to consider a number of purportedly reasonable project alternatives and concluded that the county's decision to reject the alternatives was supported by substantial evidence. The *Sundstrom v. County of Mendocino* case pertains to approval of a negative declaration based on an initial study prepared to evaluate an application for a use permit to construct a private sewage treatment plant. In this case, a hydrological study was not conducted to inform the evaluation of potential environmental impacts, but was recommended by County staff as a condition of approval. In that instance, the courts found that it was inappropriate for hydrological studies to be conducted after project approval because environmental review should occur at the earliest feasible phase in the planning process, when "genuine flexibility remains." In this case, the permit approval was the final decision on the development. The VSVSP, however, is only the first step in the planning process for the project area. Indeed, ample flexibility in implementation of the plan remains to make adjustments in response to the results of subsequent surveys conducted for specific project proposals.

06-15 The comment reiterates a comment provided on the DEIR and expresses disagreement with the response provided in the FEIR. However, the comment does not provide any new information regarding the content or analysis in the EIR.

The original comment on the DEIR reads:

> "Finally, like the DEIR's water supply section, the biological resources chapter fails to discuss California's severe drought conditions. This information is critical to determining the Project's impacts on biological resources from

> groundwater drawdown. The DEIR's failure to acknowledge the severe drought is particularly deceptive; the Project's impacts must be evaluated in light of these ecologically stressful conditions. The revised EIR should provide this detailed analysis."

The comment implies that a temporary condition should somehow be used to assess environmental effects that will occur sometime in the future. By the time the VSVSP starts construction, there is a high likelihood that the current drought will be over. It can be assured that during the 25-year buildout period for the project, the current drought will end, and there will likely be multiple periods of abundant water and further droughts. There is no requirement that CEQA evaluate biological effects that might occur in some future drought year, and then describe another set of consequences if the effect occurs in a wet year, and then describe another set of consequences if the effect occurs during a normal precipitation year, etc. The EIR correctly uses existing conditions to set a baseline and them compares environmental effects against that baseline. Effects on biological resources resulting from potential changes in groundwater elevation do consider drought years, in that the groundwater modelling incorporates a range of various annual precipitation levels, including drought.

06-16 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. However, the comment does not provide any new information regarding the content or analysis in the EIR.

See response to comment 09-59 in the FEIR regarding the programmatic evaluation and analysis of potential impacts to biological resources.

For responses to comments raised in the letter submitted by SVPSD (dated May 6, 2016), see response to comment L5-1 in this document.

The suggestion that a five-year-interval of monitoring frequency until 30 percent project occupancy may miss threshold effects of groundwater drawdown is highly unlikely. The WSA identifies sufficient water supply at full project buildout. Even if one disagrees with this conclusion, the WSA provides no evidence that at 30 percent project occupancy there would be any adverse effects on groundwater levels. The comment provides no reasoning why the planned 5-years of monitoring after project buildout, whether or not that intersects with a "significant drought period" is insufficient.

06-17 The comment states that the DEIR does not provide adequate mitigation of impacts to the yellow warbler and olive-sided flycatcher. This issue is adequately addressed in response to comment 09-84 in the FEIR. The language in Mitigation Measure 6-3 (pages 6-56 and 6-57 of the DEIR) does in fact require the applicant to establish appropriate buffers around nests and limit operating periods in consultation with CDFW to avoid disturbances during the nesting season. The comment does not provide any new information regarding the content or analysis in the EIR, but rather asserts that this is weak mitigation, leaving too much discretion to the applicant. The County disagrees with this opinion. The statement that buffers "will be established through consultation with CDFW" identifies that buffers must be determined and enforced through direct consultation with CDFW. Buffers would not simply be "established" on paper but instated in the field during construction. Consultation with CDFW would not only ensure CDFW's input on the buffer, but also their knowledge of the issue in the field and ability to enforce the buffer. Enforcement of all mitigation measures will be ensured through the County's adoption of the MMRP.

06-18 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. However, the comment does not provide any new information regarding the content or analysis in the EIR.

Regarding impacts to meadows and response to comment 09-90 in the FEIR, the comment accurately reflects the County's finding in the FEIR that the earlier comment's characterization of Sierra Nevada meadows was based on opinion. However, the response to comment 09-90 in the FEIR continues (FEIR page 3.2.4-492),

> Nevertheless, with respect to the DEIR failing to adequately address the project's contribution to cumulative loss or adverse effects on meadow habitat…Mitigation Measures 6-1a, 6-b, and 6-1c will ensure that any loss of meadow habitat be compensated for at a minimum 1:1 no net loss basis at a location agreeable to USACE and the Lahontan RWQCB, both of whom prioritize mitigation proximate to the location of the impact, and therefore, there will be no contribution to the cumulative degradation of sensitive habitats within the region or bioregion.

The determination was made that the project would not make a substantial contribution to a significant cumulative effect because there would be not net loss of acreage; not because the project impact was mitigated to a less-than-significant level. See also response to comment 09-91 in the FEIR, which states in part (FEIR page 3.2.4-492),

> The comment is correct that, generally, an otherwise direct and less than significant impact may nevertheless result in a cumulatively considerable contribution to an already significant cumulative impact, particularly if a resource is already found to be in a degraded condition.

With regard to concerns raised in comment 09-92 about cumulative effects on the habitat quality of the Truckee River, the response to this particular comment in the FEIR includes cross references to three other responses (L1-4, 09-56, and I319-4), as well as the portion of the Master Response regarding water supply specific to effects on the Truckee River. As is detailed in these responses, a streamflow analysis (included as Appendix B to the FEIR) found that the cumulative water demand of would not substantially effect the volume of water in the Truckee River. Reduced streamflow is the key concern when evaluating potential effects on fish and aquatic habitats. Also see Response 06-11 regarding Truckee River water quality.

06-19 See the Master Response regarding "Use of Parking Supply as part of Trip Generation Estimate" in this document and the responses to the MRO Engineers Report identified as letter 06.18.

06-20 The comment states that the EIR's analysis of and mitigation for impacts relating to emergency access is legally inadequate. The comment is directed at Impacts 15-4 (emergency evacuation) and 15-6 (wildfire) and further states that the EIR does not contain the necessary evidentiary support to ensure these impacts would be mitigated to less-than-significant levels.

Regarding the comment about standards or thresholds for assessing the significance of impacts relating to emergency response and wildlife evacuation, the DEIR properly relied on the CEQA Guidelines appendix G initial study checklist questions as the basis for thresholds of significance (specific to hazardous materials and hazards), which are listed on pages 15-13 of the DEIR. The comment provides no additional information as to why the Appendix G questions are not adequate as a source of significance thresholds for this project.

Responses to comments 09-209 through 09-215 in the FEIR adequately address the topics of wildfire risk and emergency evacuation. Further, see responses to comment letter L2 (submitted by Chief Pete Bansen of the Squaw Valley Fire Department) in this document, which describe *Emergency Preparedness and Evacuation Plan* (EPEP) that was prepared for the project under the supervision of Placer County (and is available on the County's website at https://www.placer.ca.gov/departments/communitydevelopment/planning/pchearings) to evaluate the risks, hazards, and response mechanisms for various emergency events, including wildland fire, avalanche, seismic events, and flooding in the project area. The EPEP was submitted to the Placer County Planning Commission in advance of the August 11, 2016 public hearing for the project. At the public hearing, testimony was provided by various County staff, including John McEldowney of the Placer County Office of Emergency Services and Lieutenant Jason Lockhart of the Placer County Sheriff's Office, regarding the EPEP. In addition, Chief Bansen of the Squaw Valley Fire Department also provided expert witness testimony on the adequacy of the EPEP.

06-21 This comment raises a number of questions pertaining to the potential indirect effects associated with motorists looking for parking during a peak winter ski day. The project provides a supply of parking to accommodate all but the busiest three or four days of a typical ski year. During such conditions, the three-lane coning program, accompanied by traffic control personnel would be in effect to efficiently deliver motorists to parking structures. Secondary effects cited in the comment include potential for illegal parking, overflow parking into neighborhoods, effects on transit service, and conflicts with bicycles or pedestrians. A detailed evaluation of those effects was not conducted because such an evaluation would have been speculative due to the uncertainty of how parking garages would be managed. For example, the increased reliance on parking structures could decrease the incidents of vehicles driving and searching for a parking space because the flow of traffic is more easily controlled and the availability of parking spaces can be more easily monitored. When a level within a parking structure is full, or the whole parking structure is full, vehicles can be directed to another level or structure. As vehicles leave the structure, this can be monitored and when a sufficient number of parking spaces are open, vehicles can be redirected to that structure. These options are not readily available in a very large surface parking lot, such as under existing conditions.

The comment also asserts that the proposed 'real time' parking supply information system would not necessarily work because there is no effective way to communicate this to the general public that may be traveling long distances (e.g., from the Bay Area). This type of system is feasible and operational at Vail, Colorado. The public can obtain minute-by-minute real-time parking occupancy data for the two primary garages serving that ski resort. Depending on their distance to the resort and level of occupancy, they can choose to park in one garage versus the other, park elsewhere in the village, or visit a different resort entirely. Similar 'real-time' systems are being implemented in downtown Sacramento in conjunction with the opening of Golden 1 Center.

Comments regarding the numbers of parking spaces provided as part of the VSVSP are repeated from comments on the DEIR and are answered by the responses in the FEIR. The comment also references comments provided by MRO engineers. See responses to Letter 08d in the FEIR and responses to comment letter 06.18 in this document. The comment letter references comments provided by the SVPSD. See Response to Letter L2 in this document. In addition, this comment fails to recognize the overall ability of the applicant to turn away customers when no parking is available. There are multiple locations prior to entering the resort to convey information on parking availability to motorists, and multiple other mechanisms to convey this information (e.g., the real time parking supply information system mentioned above). The comment states "there is no evidence that the Project would be able to manage its parking in a manner that avoids significant environmental effects";

however, the comment provides no evidence that in the future, with the requirements of mitigation measures in the EIR and other obligations, such as commitments in the Specific Plan, that it would not.

06-22 This comment states that the DEIR fails to describe current transit operations, identify the project's increase in transit demand, and evaluate the effects these increases would have on local and regional transit service. Section 9.1.9 of the DEIR describes existing transit service including bus routes, hours of service, cost, and ridership. Impact 9-7 describes the project's impacts to existing transit service including estimates of increases in peak winter ridership. The DEIR concludes that the project could cause a demand for transit that exceeds what is currently provided unless expanded service is implemented, thereby resulting in a significant impact. Therefore, each of the assertions made in this portion of the comment are not accurate.

Additional information on applicant contributions to transit funding and the adequacy of that funding has been prepared since completion of the FEIR and is detailed in the staff reports to the Planning Commission and Board of Supervisors.

06-23 The comment states that the EIR does not adopt feasible mitigation measures for the project's significant transportation impacts. These comments were previously submitted on the DEIR and addressed in responses to comments 09-132 through 09-134 in the FEIR. See also the FEIR Master Response regarding traffic and the numerous responses to comments related to traffic issues, including possible mitigation measures, both in the FEIR and in this document. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

06-24 This comment does not raise any new technical or procedural issues that have not already been addressed as part of FEIR.

06-25 The comment claims that the EIR should have been recirculated based on changes to the GHG analysis resulting from comments on the DEIR as well as a Supreme Court case that invalidated a common approach to determining GHG emissions impacts in EIRs (see extensive discussion of this issue both in Section 3.1.17 of the FEIR as well as various responses to comment letter S1 in this document, beginning with response to comment S1-9).

The County disagrees with the assertions in this comment for several reasons, as explained below:

- The comment asserts that the DEIR concluded that project impacts to GHG were less-than-significant in 2020 and that the FEIR changed this conclusion to significant. Impact 16-2 of the DEIR and FEIR both concluded that operation impacts of the project would be significant. This conclusion did not separate the project into pre- and post-2020 discussions, as it evaluated the project as a whole, a requirement of CEQA.

  The DEIR had concluded that the project would not conflict with ARB's Scoping Plan for 2020 targets. This discussion was removed from the EIR, but this does not alter the conclusion of the EIR regarding the significance of the impact. (The County notes that, in spite of this text removal, the project in no way conflicts with any Scoping Plan policies; however, the discussion of Scoping Plan targets was removed as a result of interpretations of the cited Supreme Court decision.)

- The FEIR removed the DEIR conclusion that, after mitigation, the GHG emissions for project elements completed by 2020 would be below a GHG target from the Scoping Plan and therefore less-than-significant for project elements built prior to 2020. The DEIR had

concluded that the overall project could not be mitigated to less-than-significant and that the entire project GHG impact was potentially significant and unavoidable.

The reason the text was removed, as explained in the FEIR, is that the basis for the conclusion of pre-2020 project elements would be less-than-significant was invalidated by the Supreme Court (reliance on a "business as usual", BAU approach tied to the State Scoping Plan; see Section 3.1.17 of the FEIR), and because very little of the project would be constructed by 2020 based on current timeframes. However, the GHG emissions associated with the project were not increased; in fact, a revised analysis in the FEIR demonstrated that less GHG emissions would be generated by the project. The generation of GHG emissions would still, as concluded in the FEIR, be significant, but they would be less than reported in the DEIR.

Based on this analysis, it is incorrect to argue that the GHG impact has increased in severity. It has not; GHG emissions from the overall project would be less than reported in the DEIR and the impact conclusion that the overall project would result in a potentially significant and unavoidable impact associated with GHG emissions has not changed. The impact is the same impact as reported in the DEIR but is less severe (emissions would be less). The comment fails to specify how this conclusion can be interpreted as a "more severe" impact.

The commenter's statement that two phases of the project could be constructed by 2020 does not add to the contention that the impact is more severe. The timing of when project elements are constructed is moot with regard to the overall impact of the project on GHG emissions, and no explanation is provided by the commenter to support why completion of more than one phase (if this were to be accomplished) by 2020 translates to a more severe GHG impact.

06-26 See response to comment 06-25, above, regarding the 2020 timeframe. The comment criticizes the discussion of relative GHG efficiency of the project, it provides no rationale in support of the criticism. The remainder of this comment misstates the facts, analysis, and the conclusions of the FEIR, conflating discussions of issues, planning principles, and other concepts with significance conclusions. These misstatements are addressed below.

- Regarding the commenter's contention that the FEIR finds the project is beneficial regarding GHG emissions because it would supplant older, less efficient uses, the comment confuses a discussion regarding how GHG emissions can be more efficiently generated per economic activity (less GHG emissions per land use type) if the project is properly designed, with the conclusions in the FEIR. The referenced discussion in the FEIR discusses State policy aimed at developing more GHG-efficient land uses in hopes that, over time, they will replace less efficient land uses and help achieve a Statewide goal of GHG reduction while still allowing growth of economic activity. The commenter contends this is "misleading information", yet provides no specifics as to why. The FEIR does not, anywhere, claim that the project would result in a beneficial impact to GHG emissions.

- Regarding the comment criticizing the FEIR statement that the project is consistent with many concepts in Sustainable Community Strategies (SCS), which the commenter states: "This claim is particularly disingenuous as, discussed *infra*, the Project is flatly inconsistent with the SCS for the area." As stated on page 3-95 of the FEIR, the project was not covered by an SCS but would be consistent with many of the principles that are a hallmark of SCSs:

  As described in Chapter 3, "Project Description," of the DEIR, it is adjacent to existing development (infill); would be largely built on an existing paved site (not a greenfield);

and is designed to maximize walkability, minimize internal trips, and utilize transit (VMT reduction strategies), etc.

The comment does not provide any specifics regarding why this statement is "disingenuous". It is an objective statement of fact. Moreover, the project is now included in the 2016 SACOG SCS which would support the County's evaluation; see response to comment S1-9 of this document.

- The last paragraph of this comment continues to suggest that the FEIR concludes the project would result in beneficial impacts to GHG emissions, but does not state where the FEIR makes this statement, so no reply can be provided. The statements regarding the intent of the applicant to generate profits by attracting people to the project, and that this would result in environmental impacts, is noted.

- The comment that this is a "new resort" is noted. The comment admonishes that "(T)o claim otherwise is misleading and violates CEQA." The comment does not cite where the FEIR states, implies, or in any way suggests that the project is not a new resort. This is a misleading statement by the commenter. The commenter is referred to the 41-page project description in the DEIR (Section 3), as modified by pages 2-1 through 2-6 of the FEIR, for a discussion of how the project site will be modified to include a four-season resort with residences, commercial areas, a village concept, "Mountain Adventure Center", parking structures, etc. The FEIR evaluates this project.

- Regarding the request that the EIR "must be recirculated to remove any claims that the Project will or may benefit the climate," the only such claim is the commenter's, and this response clarifies this misstatement.

06-27 The comment claims the FEIR did not address implications of the project's inconsistency with the MTP/SCS. The DEIR acknowledges at page 16-18 that the project was not assumed in the MTP/SCS (in place at the time the DEIR was prepared) and that the project emissions would be additional to SCS assumptions. However, this is no longer the case; see response to comment S1-9 of this document regarding the fact that the project is now included in the SCS.

Regarding the statement that the FEIR "fails to provide the public with an understanding of how a major new regional source of GHG emissions from a resort project…could throw the State off the steep emissions reductions trajectory needed to help correct course to avoid some of the most catastrophic impacts from climate change":

- The FEIR concludes that the project would result in a potentially significant and unavoidable impact to climate change associated with GHG emissions. From a CEQA standpoint, "significant and unavoidable" is the most adverse of conclusions with respect to an environmental impact.

- The statement that the project "could throw the State off the steep emissions reductions trajectory" suggests this project is orders of magnitude larger than it is. As described in response to comment S1-9 of this document the project's emissions represent 0.01 percent (one one-hundredth of one percent) of State's GHG emissions. It is simply too small of a GHG emitter to substantively effect overall California GHG emissions. This is not to suggest that the project will not play a role in statewide GHG emissions; it will along with a multitude of other projects. Rather, it would be inaccurate to claim the project is of sufficient magnitude to "throw the State" off its trajectory.

- The comment ignores the FEIR mitigation, which includes reducing GHG emissions to target levels if feasible, and purchasing GHG emissions offsets to close that gap. Thus,

where the project may not be able to reduce onsite emissions, it would be required to purchase offsets to attain targets. Thus, targets will be attained; however, they may be attained off site or even in a location outside of California. GHG emissions are, after all, global.

- The comment claims the FEIR should have followed the commenter's prior suggestions to establish a specific GHG reduction target ("comparing Project or vehicle emissions to the regional targets set for 2020 and 2035 by the MTP/SCS", etc.) and states "the County is on notice that the requested analysis is feasible." The consultant preparing the EIR has substantial expertise preparing GHG analyses. This expertise includes preparing still-cited guidance papers on GHG analysis for the California Air Pollution Control Officers Association (co-author: CEQA and Climate Change, 2008) as well as providing expert assistance to the Bay Area Air Quality Management District in establishment of its GHG thresholds—thresholds that were specifically cited as valid in the referenced Supreme Court case (*CBD v.* CDFW). This expertise extends to preparation of climate action plans throughout the state, and vast other related experience. The consultant has concluded that there is simply no feasible approach to establish a project-specific GHG reduction target, absent a jurisdiction-specific GHG reduction plan (such as a climate action plan and/or an SCS [which pertains to vehicle emissions targets only]) or policy approaches yet to be developed by the State. The comment does not provide any suggestions, examples, or evidence as to the "feasible" approach. Thus, while the County appreciates the comment that such an analysis "is feasible", the comment is without support. However, as noted, the project is now included in the SACOG SCS, and the County has funded a GHG reduction plan (see response to comment S1-10). Thus, the mitigation included in the FEIR is not only feasible, but will place the project along the appropriate trajectory consistent with SB 32 targets (1990 GHG levels by 2020; 40 percent below 1990 GHG levels by 2030), as geographically applied to this type of project.

06-28 The comment states the GHG analysis relied on partial trip lengths in calculating GHG emissions. This is not accurate. VMT was used for 2 purposes in the DEIR, and now has been used for a third purpose in the FEIR. For the DEIR, VMT was used to determine air quality impacts to the air basin, which is based on total VMT in the air basin, and for GHG emissions, which is based on VMT inclusive of trips that originate or end outside of the air basin. See Appendix H of the DEIR and Appendix C of the FEIR. Thus, the GHG analysis considers full trip lengths to and from the Bay Area, Sacramento area, and other origins. The statement in the FEIR regarding "overestimation" of GHG emissions for vehicles traveling through the Bay Area and the Sacramento area is accurate; these GHG emissions are accounted for in the SCS's prepared for these regions. However, while overestimated, the EIR did not discount these emissions from the analysis. Therefore, the EIR fully considers GHG emissions associated with vehicles originating in the Bay Area and Sacramento area, even if these emissions are also accounted for in the SCS documents.

Regarding the 92-mile trip length, while this may represent the average distance for a car driving to or from the Bay Area/Sacramento area, the same vehicles would also take smaller excursions once they arrive at the VSVSP project site, such as occasional trips to the Tahoe basin. The 30-mile average trip length is just that, an overall average.

Regarding the comment on air travel, the EIR concludes that the project is unlikely to result in increases in the number of air flights to the region and concludes it would be speculative to assume that new flights would be added. The comment fails to explain why the conclusion in the FEIR is not adequate or accurate. The mere fact that Squaw Valley advertises that people can fly to the region is not evidence that the project would result in more flights. See response to comment 09–156 in the FEIR. The comment confuses forecasting with speculation. A forecast must be based on a reasonable expectation, based on substantial

evidence. There is no expectation that more flights would be added, based on the project, and no evidence was provided to suggest otherwise.

06-29 The comment primarily questions the decision to link the performance metric in Mitigation Measure 16-2 to state targets, rather than the 1,100 MT threshold applied in the EIR. As an initial matter, the comment claims that "the FEIR has employed a different threshold of significance for GHGs…" In fact, no change in the thresholds of significance used in the analysis is indicated. Pages 2-76 to 2-83 in the FEIR indicate revisions in the analysis of GHG effects to reflect the recent California Supreme Court decision, *CBD v CDFW*. The PCAPCD Tier I mass-emission threshold of 1,100 MT CO_2e/year is applied to the project in both the DEIR and FEIR.

The comment also reiterates a previously-expressed position that Mitigation Measure 16-2 improperly defers mitigation, and specific measures should be imposed on future development in this analysis of the specific plan. As detailed in response to comment S1-10, GHG reduction targets are subject to change in response to legislation or governor executive action in the future. Mitigation Measure 16-2 recognizes that both GHG emission targets and regulatory programs that limit GHGs are apt to change over the 20-year (estimate) project construction timeframe. Consequently, Placer County concluded that using a static target to assess the significance of project impacts and the type and extent of mitigation would not recognize the nature of progressing GHG programs and regulatory actions, and the degree to which they can succeed in reducing GHG emissions. Mitigation Measure 16-2 requires that GHG emissions associated with the project are reduced to the point that they meet GHG reduction targets, calculated with the future targets and regulatory programs that reduce GHG emissions in place at the time subdivision maps for project phases are submitted. The targets would be based on a substantiated linkage between the State goals or a local (Placer County) GHG reduction plan.

As noted in the comment, there are many known methods to reduce GHG emissions. The FEIR lays out a list of GHG reduction measures that are considered feasible (see page 3-108), including solar panels, Energy Star appliances, and exceeding Title 24 energy efficiency standards, and determined that these measures would reduce GHG emissions by 5,097 MT CO2e/year in 2037 (assuming full buildout by that year). The degree to which these programs would be implemented would be based on a Placer County GHG reduction program or some other substantiated link to AB 32 targets. The County recently approved funding for the preparation of a countywide GHG reduction plan that would provide the requisite program; the plan is scheduled for completion in 2018[3]. If the GHG reduction plan is not completed, the project can be linked to AB 32/SB 32 targets through compliance with Scoping Plan programs applicable to the project. The AB 32 Scoping Plan programs currently applicable to the project are outlined in Appendix G of the FEIR and are listed on page 3-108 (and summarized above). (A scoping plan for implementation of SB 32 is in the preparation stage.)

Therefore, the mitigation measure provides a performance standard to be met by project development, a suite of feasible actions to meet the performance standard, an assessment of the mitigation potential of those actions, and a mechanism for the lead agency to track and enforce compliance with the performance standard. Mitigation Measure 16-2 is designed to flexibly respond to the uncertain future of GHG policies and programs. This adaptive management provides a mechanism to promote the most effective measures to reduce the emissions from specific proposals in light of the future regulatory scenario, physical environmental conditions, and technological advancements.

[3] Fisch, Alex. Supervising Planner. Placer County Planning Services Division, Auburn, CA. August 31, 2016—telephone conversation with Gary Jakobs of Ascent Environmental regarding the countywide GHG reduction plan.

06-30 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. However, the comment does not provide any new information regarding the content or analysis in the EIR. As explained elsewhere, the level of detail provided in the analysis and mitigation is sufficient for a programmatic EIR; and a programmatic EIR does, in fact, have a unique function and requirements.

Further, for the purpose of noise measurements and modeling, the nearest receptor is used as a "worst case" representation of one's potential level of exposure. This provides members of the public with ample information to determine how noise from the project would affect them. Note also that, although the comment asserts that sensitive receptors are not identified in Exhibits 11-1 and 11-2 of the DEIR, which identify noise sensitive land uses and noise measurement locations, such receptor locations are in fact labeled in white on the exhibits.

06-31 The comment criticizes the FEIR for not mitigating construction noise impacts to a less-than-significant level. As explained in Mitigation Measures 11-a and 11-b of the DEIR and in several sections of the FEIR, including 3.15 and 3.16, despite application of various measures, the construction noise would be significant and unavoidable because noise sources would be mobile. Noise shields and other measures would be effective but would not necessarily sufficiently reduce nighttime noise during temporary (infrequent) nighttime construction noise events, and daytime noise would be sporadically disruptive during construction. The comment's contention that the explanation in the FEIR is consistent with the notion that "the greater the environmental harm…the lesser the obligation of conducting environmental review" is incorrect. The issue is not the intensity of the "environmental harm" as the EIR identifies the potential for nighttime construction noise to be a significant impact. The issue is the complexity of the impact mechanism and the level of speculation and conjecture required to provide the level of detail requested by the commenter. The EIR identifies that there are circumstances where nighttime construction might occur. Whether nighttime construction is required will be dependent on the design of each structure, the construction methods used, and other factors that cannot be determined at this phase of the project. The EIR correctly provides mitigation for the impact, but also identifies that there are circumstances where the mitigation may not be feasibly or fully effective (e.g., moving vehicles). Therefore, the EIR correctly identifies the impact as significant and unavoidable.

The comment suggests that the same mitigation measures applied to avoiding noise impacts to Squaw Valley Academy could be applied elsewhere (replacing windows, increasing insulation, etc.). The reason this mitigation was proposed for the Academy is that it would protect the primary function of this use: educating students during daytime classes when construction activities would typically take place.

However, the Placer County noise ordinance exempts daytime construction noise from its standards. This is typical of noise ordinances in jurisdictions throughout the State, in recognition that daytime uses are not as noise sensitive as nighttime uses. Because of this exemption, and because other measures would substantially reduce noise (although not to the point where it would never be disruptive), additional mitigation was not proposed. It would be infeasible to provide noise-reducing windows and noise-reducing insulation in all sensitive land uses in order to mitigate noise levels that are exempted by ordinance. As to nighttime noise, because construction activities at night would be infrequent and would only occur when needed (example: to complete a concrete pour), and would be subject to mitigation (temporary noise barriers), additional mitigation such as window replacement would be considered cost prohibitive in consideration of the temporary nature of the effect (i.e., the mitigation would not be proportional to the impact).

As to vibration mitigation, the measure provides conformance to a standard and engineering studies, subject to approval by Placer County, as well as monitoring and reporting; see page

11-23 of the DEIR. The specific approach the applicant would take to achieve this standard can be accomplished by a number of means, as outlined in the measure; the actual approach need not be identified at this time (it will be subject to engineering studies at the subdivision map level if the project is approved) so long as the performance standards are met, including specific approvals and monitoring by/reporting to Placer County.

06-32 See response to comment 06-30, above, regarding the locations of sensitive receptors; these receptors are labeled ("residential," "Red Wolfe Lodge," etc.) on Exhibits 11-1 and 11-2 of the DEIR and the tables correlating existing noise measurements to these uses (Table 11-3 of the DEIR).

The remainder of the comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR with regard to the location of noise-generating uses. These uses are identified and evaluated to the degree they are known; where not known, worst-case assumptions regarding the potential effects on sensitive land uses are provided and performance standards to reduce the effects to less-than-significant are proposed. This is an appropriate approach for identification of impacts and mitigation; the comment does not explain why this approach is invalid.

As to mitigation and performance standards associated with HVAC units, see Mitigation Measure 11-2 on page 11-28 of the DEIR. Regarding mitigation associated with outdoor activities, see Mitigation Measure 11-4a on pages 11-29 and 11-30 of the DEIR.

06-33 Regarding the comment that the EIR underestimated traffic-related noise impacts, as explained on page 3-45 of the FEIR, the approach to noise analysis was based on *peak day* traffic levels, rather than on annual average traffic, which is the typical approach to traffic noise impact analysis. To that end, it could be argued that the FEIR overestimated traffic in calculating noise. However, as explained in the FEIR, this unusual analytical approach was taken in the FEIR in recognition of the peak-nature of project traffic generation.

As to traffic noise, the FEIR acknowledged that the DEIR may have erred in its assumption that residences located along Squaw Valley Road all have dual-pane windows. The FEIR rectified this by requiring re-pavement of Squaw Valley Road with rubberized asphalt, which would reduce existing plus project noise to the point where it is less than existing conditions. See discussion on pages 3-44 through 3-49 of the FEIR. Based on this, the FEIR concluded that noise would be reduced to a less-than-significant level (rather than being significant and unavoidable as concluded in the DEIR).

The comment states that the 4-6 decibel noise reduction associated with the mitigation is not supported by substantial evidence, but fails to explain why the reference for this data is insufficient (see citation on page 3-46 of the FEIR). As to criticism on the "4-6" decibel reduction, this is the total range of expected reduction depending on a variety of factors, and the low end (4 decibel reduction) is sufficient to fully mitigate project traffic noise; see page 3-48 of the FEIR.

06-34 The commenter's assertion that re-paving Squaw Valley Road would result in new environmental impacts (wildfire evacuation hazard, toxic air pollution, odors, water quality) is unsupported. First, re-pavement of roads is a routine activity that occurs as a matter of normal maintenance and is sequenced so that roads can still be used while re-pavement occurs (timing the activity to non-peak times, closing strips of roads and narrowing lanes to allow two-way traffic, traffic control, etc.). Re-pavement would likely occur when road use is lowest so as to not cause traffic disruption. Also, re-pavement would be subject to the same construction mitigation as the rest of the project's construction activities (water quality control measures, air permitting, etc.). This comment provides no evidence that new impacts would occur.

06-35 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. In response to comment 09-195, the FEIR (page 3.2.4-524) states: "The baseline for the visual analysis is described in Section 8.1, 'Environmental Setting,' in Chapter 8, 'Visual Resources,' of the DEIR." Baseline night sky conditions are also described in the master response regarding the visual impact analysis in the FEIR (see pages 3-35 and 3-36).

Further to comment 09-195, the FEIR states:

> The Granite Chief Wilderness Area is a large area. As established in Section 8.1.5, "Summary of Viewing Conditions," in the DEIR, trail users would generally have limited views of the Valley due to terrain and vegetation.
>
> The DEIR concludes that new light and glare generated by development in the main Village would have a significant and unavoidable impact on views of the area. As indicated in the analysis (see page 8-60), standard practices and design guidelines would reduce the effect of additional lighting. However, more lighting and associated sky glow may still be perceived as a significant change. This is true both within the immediate vicinity of the project and from remote viewing locations, including the Granite Chief Wilderness Area and the Basin. Therefore, additional consideration of the project's potential effects on neighboring jurisdictions would not change the analysis conclusions of the DEIR. For further discussion of the existing light and glare conditions as viewed from neighboring jurisdictions, refer to the Master Response regarding the visual impact analysis in the FEIR. For a discussion of the project's consistency with TRPA policies, see the Master Response regarding TRPA thresholds in the FEIR.

This should not be misconstrued to indicate a change in significance determination. The potential for the project to be viewed from the Granite Chief Wilderness Area was acknowledged in the DEIR, which also concluded that there would be significant impacts associated with light to those viewing the area. The mitigation measures recommended to reduce lighting impacts would also reduce the effects to viewers from the Granite Chief Wilderness Area. Contrary to the comment's claim, an analysis of the effects of the proposed development on night skies has been conducted that is sufficient to conclude the level and types of impacts anticipated from subsequent projects that may be proposed under this plan. Further analysis is not necessary.

06-36 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR, and also identifies new concerns related to the analysis of light produced by the VSVSP.

With respect to the efficacy of Mitigation Measure 8-5a, which calls for the installation of landscaping to screen light emitted by the East Parcel, the measure does provide for oversight by the Development Review Committee. Specifically, "Landscape screening shall be installed concurrent with the first phase of development on the East Parcel and shall be reviewed for effectiveness with each successive phase of development. If after the initial installation of landscape screening it is subsequently determined that additional screening is required to improve screening effectiveness, the Development Review Committee (DRC) may require installation of additional landscaping during future construction phases." The "massive buildings" noted in the comment would not be located on the East Parcel. As stated in the DEIR (page 8-59), "employee housing structures nearest the residential areas to the north of the site would be approximately 56 feet in height and the shipping and receiving structure would be 40 feet in height." Furthermore, since publication of the DEIR, the design and layout of land uses on the East Parcel has been revised, as described in Section 2.1,

"Project Modifications," of the FEIR, and employee housing buildings would be limited to a maximum of 35 feet tall.

Mitigation Measure 8-2b (as also implemented by Mitigation Measure 8-5b) ensures that all project phases will be compatible with the Plan Area Development Standards prescribed in Appendix B of the VSVSP by requiring the applicant to obtain Design Review approval from the Placer County Design/Site Review Committee (D/SRC). Mitigation Measure 8-5b also requires preparation on an Improvement Plan that includes a detailed lighting and photometric plan. The comment asserts that there are no performance standards or criteria to govern the future implementation of this mitigation. In fact, the mitigation measure includes specific standards related to streetlights, lights in parking areas, building lights, and landscape lighting. Given that this programmatic EIR analyzes a specific plan and the design for specific structures has not been completed, it is inappropriate prepare such a detailed lighting plan at this stage of design. The intent of the plan, and the specific requirements provided in Mitigation Measure 8-5b, is to limit excess light productive that could affect the quality of nighttime views in the Valley. As noted in the master response addressing the visual impact analysis in the FEIR, the "DEIR concludes that residents and visitors may consider any new light, though designed to mitigate potential sky glow to the extent feasible, an adverse change in nighttime views of the area" and "CEQA establishes that 'public agencies should not approve projects as proposed if there are…feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…' (Public Resources Code [PRC] Section 21002)." As such, this measure is included in the project as a feasible measure to eliminate excess light that could be viewed from adjacent residences, but is not considered to effectively eliminate light pollution. The impact is determined to be significant and unavoidable for the main Village area (DEIR page 8-60).

Finally, the comment indicates that suggestions regarding methods to limit light pollution were not considered. In fact, the responses to comments 09-195 to 09-199 in the FEIR explain that the methods outlined in the comment are either expressly included in the lighting plan, methods that would include similar results are already included in the plan, or the measure is considered impractical. For example, response to comment 09-196 states that established "standards address light and glare impacts by committing to measures related to shielding, spectrum, and quantity of light. Specific requirements include shielding outdoor lighting, use of full cut-off luminaries for street lighting, use of energy-saving and warm-toned lamps, and a list of prohibited lighting types. These guidelines meet or exceed Placer County's requirements." Response to comment 09-197 in the FEIR indicates that the VSVSP was amended to "limit fluorescent lighting use to interior spaces only" in response to the comment.

06-37 The comment states that the FEIR does not adequately respond to comments about the project's impacts to historic resources. The commenter's previously submitted comments on the DEIR (specific to historic and cultural resources) are addressed in responses to comments 09-200 through 09-206 in the FEIR. Additionally, this topic is addressed in responses to comment letters I137 and I138 (submitted by Dan Hikel).

Regarding the comment that the FEIR does not provide substantial evidence that other historic buildings on the site are not significant, response to comment 09-201 appropriately describes the confidential nature of select project-related reports, including those pertaining to cultural resources. In fact, these types of reports are often labeled as confidential and only released to qualified professionals, as noted in the FEIR response. This is because archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure of information regarding their location. Cultural survey documents contain sensitive information regarding the nature and location of archaeological sites that should not be disclosed to the general public or unauthorized persons. Information

regarding the location, character, or ownership of a cultural resource is exempt from the California Public Records Act under Government Code Section 6254.10. Specific to historic resources, however, these types of reports can be made available to members of the public under certain circumstances due to the decreased sensitivity of historic buildings relative to archaeological resources (which may also have Native American significance). Therefore, it is at the County's discretion to make the historic resource evaluation report prepared for the project available to members of the public. We are unaware of the commenter making a request to review this report. Regardless, the information contained in that report is summarized in the DEIR and provides substantial evidence for the DEIR's conclusions, contrary to the commenter's assertion.

Regarding the comment that the FEIR does not discuss the project's consistency with Placer County General Plan Policy 5.D.6, see responses to comments 09-248 and 09-249 in the FEIR, which address project consistency with General Plan policies related to cultural resources, as well as the General Plan's overall goal related to cultural resources. Contrary to the commenter's assertion, Policy 5.D.6 does not prohibit the damage or destruction of these resources. Rather, it requires applicants to identify and protect these resources. Cultural resources are described in the DEIR, which identifies the loss of historic structures as a significant and unavoidable impact, despite the application of mitigation measures that include documenting historic buildings before removal and creating an interpretive program, exhibit, or display. The County Planning Commission and Board of Supervisors will determine whether the project is consistent with the overall intent of the General Plan based on their view of these policies, and the importance ascribed to the buildings as historic resources. Therefore, the EIR is adequate and no changes are necessary in response to this comment. Also, see the Master Response regarding recirculation in the FEIR.

Regarding the comment that the FEIR does not provide substantial evidence for the conclusion that potential impacts to archaeological resources would be mitigated to a less-than-significant level, Mitigation Measures 7-3a through 7-3d require the applicant to conduct standard industry practices such as performing Native American monitoring, implementing worker environmental awareness training, stopping work in the event of a discovery, and preparing subsequent evaluation reports. These standard industry practices constitute effective mitigation because they would ensure that archaeological resources are avoided, moved, recorded, or otherwise protected and treated appropriately, in accordance with pertinent laws and regulations (DEIR page 7-23). Mitigation Measure 7-3c, which is specifically cited by the commenter, states that

> …if complete avoidance is not possible, follow accepted professional standards in recording any find including submittal of the standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area (the NCIC).

The commenter incorrectly states that the EIR admits elsewhere that mitigation to a less-than-significant level can only occur if the resource is avoided. In fact, as noted above, the DEIR states that impacts to archaeological resources (Impact 7-3) would be reduced to a less-than-significant level because "actions would be taken to avoid, move, record, or otherwise treat the resource appropriately, in accordance with pertinent laws and regulations" (DEIR page 7-23).

Finally, regarding the comment that the DEIR mitigation does not provide for contingency funding and a sufficient time allotment to allow for avoidance or appropriate mitigation, the commenter misinterprets CEQA Guidelines Section 15064.5. Response to comment 09-204 in the FEIR quotes this section of the CEQA Guidelines and appropriately states that the DEIR mitigations is consistent with this section. "Contingency funding and sufficient time allotment," as the commenter demands, would be *available* [emphasis added] as required by

CEQA and provided by the applicant to implement Mitigation Measure 7-3c. Contrary to the commenter's assertions, CEQA does not require mitigation measures to include such details as contingency funding and detailed schedule information.

06-38 The comment pertains to the DEIR's public safety analysis and mitigation. The commenter's previously submitted comments on the DEIR (specific to public safety) are responded to in responses to comments 09-207 through 09-219 in the FEIR.

Regarding wildfire risk and emergency access, see response to comment 06-20, above.

Regarding earthquake and avalanche risks, responses to comments 09-207 and 09-208 in the FEIR adequately address this issue and explain why mitigation measures in the DEIR are not deferred, as the commenter asserts. As noted by the commenter and in the FEIR responses, an Avalanche Hazard Study[4] was prepared for the project, results of which are summarized throughout Section 12, "Soils, Geology, and Seismicity," of the DEIR. This report was cited as a reference in the DEIR, and, as such, is available on the County's website at: http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageatsquawvalley/references.

Regarding the comment that the FEIR does not provide substantial evidence that seismic and avalanche hazards will be reduced to a less-than-significant level, this issue is adequately addressed in response to comment 09-208 in the FEIR, which states that recommended mitigation measures would not eliminate risks entirely. Rather, mitigation measures would lower the magnitude and probability of the impacts to an acceptable level, which is standard practice in California. The commenter misinterprets the portion of the FEIR response that compares the risk of various activities. Here is the full sentence from the FEIR response,

> Some degree of risk is inherent in nearly every activity, from walking on a sidewalk to riding a bicycle or driving to the grocery store, and more people are injured in these activities than earthquakes, avalanches, etc.

The County did not intend to trivialize seismic and avalanche hazards, but rather to demonstrate that risk in inherent in many different types of activities, and especially in California. The FEIR response states that "…the vast majority of California, for instance, is subject to seismic hazards from earthquakes and development continues to be approved, subject to adherence to building codes (without the need for EIRs)." The County will review and consider approval of the project's Fault Evaluation Report and Avalanche Hazard Study, as noted in the FEIR response. The comment provides no new information applicable to the EIR analysis.

06-39 The use of Lot 28 for propane storage was eliminated as a potential project element in the errata sheet released August 4, 2016. With respect to propane storage elsewhere in the Valley, the comment provides no evidence contrary to the County's understanding that significant impact associated with propane storage would be avoided through compliance with existing regulations related to tank design, operation, and emergency response. As indicated in response to comment 09-217 in the FEIR (page 3.2.4-532), CEQA requires that reasonably foreseeable environmental impacts are disclosed (CEQA Guidelines Section 15064[d]). The County believes that it is reasonable to presume that the tanks would be designed in a manner appropriate for the geologic climate and managed in a way that avoids leaks that could affect water quality, soils, and safety. Applicable regulations are identified in the DEIR (page 15-9). Potential effects on water quality associated with operation of the

[4] Heywood, Larry. 2014 (March 7). *Avalanche Hazard Study: Village at Squaw Valley Specific Plan Squaw Valley, California*. Prepared for Squaw Valley Ski Corporation.

storage tanks are analyzed in Impact 13-1 (pages 13-45 through 13-47 of the DEIR). Use of hazardous materials is addressed in Impact 15-1 (pages 15-15 through 15-16), and interference with an adopted emergency evacuation plan is addressed in Impact 15-4 (page 15-19).

06-40 The comment states that the EIR failed to adequately evaluate project consistency with the Placer County General Plan and the SVGPLUO. The comment goes on to list several policies that the commenter claims would be inconsistent with plan approval. The commenter claims that the perceived inconsistencies result in significant and unavoidable impacts and that approval of the project would violate CEQA and California Planning and Zoning Law.

The following information is provided in response to each claim of inconsistency.

Placer County General Plan Policy 3.A.7

See response to comment O7-3 in this document for the text of this policy as well as a response to the comment that the project is inconsistent with Policy 3.A.7. Furthermore, the commenter's claim that traffic impacts would be "unmitigated" is incorrect as the EIR has identified and applied all feasible mitigation. However, not all traffic impacts are able to be mitigated to a less-than-significant level. The commenter also claims that other project impacts, such as air quality, noise, and public safety were not taken into account in the EIR analysis. This claim is incorrect as analyses of air quality, greenhouse gas emissions, noise, and public safety impacts were modelled and analyzed to incorporate data from the traffic analysis.

Placer County General Plan Policy 3.A.8

See response to comment O7-3 in this document for the text of this policy. The commenter states that the EIR provides no evidence that the County or the applicant has made any attempt to work with local jurisdictions to provide acceptable levels of service and asserts that the project would result in significant impacts in contravention of Policy 3.A.8.

The commenter provides no evidence for this unfounded assertion. In addition to compliance with CEQA notification requirements, County staff and the County's traffic consultant have had numerous written correspondences and meetings with Town of Truckee staff, TRPA staff and Caltrans staff throughout review of this project. An initial meeting with Caltrans staff was conducted to confirm study periods, locations, and analysis methods, as well as roadways that did not require study because of the project site, peaking characteristics, and expected distribution. Further meetings/coordination with Caltrans staff were conducted to determine appropriate mitigation strategies. County staff also met with the Town of Truckee staff on multiple occasions to discuss various aspects of the project, including traffic, and the County staff has also met with TRPA staff on multiple occasions to discuss project impacts to traffic in the Lake Tahoe Basin and the expansion of transit services to reduce existing levels of traffic and project generated traffic.

In 2007, Placer County and the Town of Truckee executed a Cross Jurisdictional Traffic Fee Agreement, which found that equivalent levels of impact that were projected to occur within each jurisdiction's transportation network. The Town of Truckee and Placer County agreed not to require payment of Traffic Fees to each other because the payments would effectively cancel each other out. Instead, the Cross Jurisdictional Traffic Fee Agreement determined that each jurisdiction will retain the full amount of the Traffic Fee payments applied to new projects within each respective jurisdiction and utilizes those monies to fund network improvements within the jurisdiction where the fees are collected. This agreement is still in effect and the Town of Truckee has not requested to modify the agreement. No project impacts to the transportation network are projected to occur outside the jurisdictional boundaries of Placer County and the Town of Truckee.

Placer County General Plan Policy 1.G.1

See response to comment O7-3 in this document for the text of this policy. Regarding the comment that the project is inconsistent with Policy 1.G.1, see response to comment O4-12 in this document.

Placer County General Plan Policies 1.K.1 and 1.K.5

The text of these policies is provided below.

> The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:
>
> A. Avoids locating structures along ridgelines and steep slopes;
>
> B. Incorporates design and screening measures to minimize the visibility of structures and graded areas;
>
> C. Maintains the character and visual quality of the area.
>
> The County shall require that new roads, parking, and utilities be designed to minimize visual impacts. Unless limited by geological or engineering constraints, utilities should be installed underground and roadways and parking areas should be designed to conform to the natural terrain.

The project does not include new development that would be located along ridgelines, and the vast majority of new development would be located on flat or nearly flat ground. A small portion of the project area (Lots 16-18) would be located in an area with steeply sloping topography; however, no buildings would be constructed on contiguous slopes steeper than 25 percent in accordance with policies of the Squaw Valley General Plan. In accordance with existing County policy and the policies of the specific plan, all project development would be subject to design review approval. Project designs would be required to comply with the provisions of the Development Standards and Design Guidelines, which include detailed provisions for landscape screening, retaining walls for grade cuts, architectural design and all other aspects of site design. Compliance with the Development standards and Design Guidelines, which express project designs and materials usage that reflect the natural environment and mountain architecture, would ensure that the visual quality and character of the area are maintained. In addition, policy PU-8 of the specific plan specifies that all new dry utilities shall be installed underground. Linear wet utilities, such as sewer and water, are installed underground except those portions that cannot be undergrounded due to needs for access and maintenance (e.g. well pumps, sewer lift stations). Any above-ground utility installations would be reviewed during design review and screened to the extent feasible. Also, see Chapter 8, "Visual Resources," in the DEIR and the Master Response regarding the visual impact analysis in the FEIR for information related to the visual quality of the project and the design review process.

Placer County General Plan Policies 6.A.3 and 6.C.1

The text of these policies is provided below.

> The County shall require development projects proposing to encroach into a stream zone or stream setback to do one or more of the following, in descending order of desirability:
>
> a. Avoid the disturbance of riparian vegetation;

b. Replace all functions of the existing riparian vegetation (on-site, in-kind);
c. Restore another section of stream (in-kind); and/or
d. Pay a mitigation fee for in-kind restoration elsewhere (e.g., mitigation banks).

The County shall identify and protect significant ecological resource areas and other unique wildlife habitats critical to protecting and sustaining wildlife populations. Significant ecological resource areas include the following:

a. Wetland areas including vernal pools.

b. Stream zones.

c. Any habitat for special status, threatened, or endangered animals or plants.

d. Critical deer winter ranges (winter and summer), migratory routes and fawning habitat.

e. Large areas of non-fragmented natural habitat, including blue oak woodlands, valley foothill and montane riparian, valley oak woodlands, annual grasslands, and vernal pool/grassland complexes.

f. Identifiable wildlife movement zones, including but not limited to, nonfragmented stream environment zones, avian and mammalian migratory routes, and known concentration areas of waterfowl within the Pacific Flyway.

g. Important spawning and rearing areas for anadromous fish.

The project does not include construction of above ground improvements, such as buildings or parking structures that would disturb riparian habitat or encroach on a stream zone. Portions of the Class 1 trail and Squaw Creek linear interpretive park located between the south side of Squaw Valley Road and the north side of Squaw Creek may include portions of the trail that would be located within the 100-year floodplain of Squaw Creek. However, the majority of the trail is anticipated to be located outside of the 100-year floodplain and stream corridor.

The project proposes to comprehensively restore this impaired section of Squaw Creek in compliance with policies of the Squaw Valley General Plan and the Placer County General Plan, both of which call for restoration of streams and other bodies of water previously altered by human activities. Furthermore, stream restoration would improve stream habitat conditions within the project boundary (and reduce downstream impacts resulting from the current condition) and would result in creation of new wetlands that would trap harmful sediments that are a primary contributor to impaired water quality within the stream, thereby potentially improving fisheries and stream habitat. Newly created wetlands would comprise a significantly larger area than the existing wetlands that would be disturbed during construction of the stream restoration project, and it is anticipated that their functionality would also be improved over the existing wetland that is somewhat degraded due to its proximity to existing ski resort uses, such as volumetric snow storage, that have led to excessive sedimentation.

No aspect of the project is inconsistent with the cited policies and the commenter provides no evidence in support of their claim of inconsistency. Also, see response to comment 09-110 and responses to comment letters 08a, 08b, and 08c (submitted on behalf of Sierra Watch) and 014 (submitted by the Truckee River Watershed Council) in the FEIR, which address stream restoration.

Placer County [Tahoe Basin] Area Plan Policy LU-P-5

The commenter asserts that the project is inconsistent with Placer County [Tahoe Basin] Area Plan Policy LU-P-5 that the County, "*Direct development towards Town Centers and preserve the character of surrounding neighborhoods.*" This policy is contained in the public draft of the Tahoe Basin Area Plan and is specifically directed at land use policies of the Tahoe Basin Area Plan. The VSVSP project is not located within the geographic area covered by the Tahoe Basin Area Plan, and therefore the policy is not applicable to project. However, it is notable that the project would redevelop an existing ski resort base and that the majority of the project would occur on previously disturbed lands that are already developed with ski resort uses.

Squaw Valley General Plan Policies

The commenter asserts that the FEIR does not resolve the numerous inconsistencies with the SVGPLUO, specifically stating that the FEIR uses flawed reasoning to conclude that the project is consistent with SVGPLUO policies by downplaying the project's significant increase in traffic trips, congestion, and delays. This issue is adequately addressed in response to comment 09-253. Also see the Master Response regarding traffic and the Master Response regarding the SVGPLUO in the FEIR.

06-41 The comment states that the DEIR's analysis of the project's population, employment, and housing and growth-inducing impacts is inadequate and underestimates the project's impacts. The comment further states that the FEIR does not correct these inadequacies and unrealistically minimizes the number of new employees by relying on full-time equivalent (FTE) employees. This issue was addressed in responses to comments 09-261 through 09-268 (population, employment, and housing impacts) and 09-269 through 09-276 (growth-inducing impacts) in the FEIR. Also, see responses to comment letter 012b in the FEIR, which contains a detailed discussion of potential growth associated with the project, including growth from anticipated workforce housing demands.

Regarding the comments about FTE and seasonal fluctuations in employees, see responses to comments 09-264 and 09-265 as well as 012b-10 in the FEIR. The comment also references comments made by the Nevada County Board of Supervisors and responded to in the FEIR (see response L1-2). As described in response to comment L1-2 in the FEIR, the DEIR properly analyzed potential secondary impacts related to traffic (including parking), air quality, and transportation related noise.

As described in the staff report to the Planning Commission, the project would develop employee housing for up to 201 new resort employees plus replacement housing for 99 existing employee units (with a maximum of up to 300 employees including some replacement employee housing). The remainder of employee housing would be fulfilled by construction of off-site employee housing, dedication of land needed for units, payment of an in-lieu fee, or any combination thereof in accordance with General Plan Policy C-2 and employee housing policies contained in Specific Plan Section 3.5 (Employee Housing). In addition to these commitments, the project would also contribute $500,000 to the County for development of workforce housing in the greater Lake Tahoe region. Accordingly, the project would comply with Placer County General Plan policies pertaining to provision of workforce housing in the Eastern portion of the County and would contribute additional funding to the County for provision of additional housing. The Board of Supervisors will consider the merits of the project's Employee Housing Plan and its contributions toward resolving the region's shortage of workforce housing options when rendering a decision on this project.

Regarding the comment that the EIR's application of lodging-occupancy assumptions to employee occupancy is unjustifiable, see the Master Response regarding occupancy

assumptions in the FEIR. The comment frequently critiques the use of the 55% occupancy rate as if it was representative of a peak occupancy rate for employee housing (e.g., implying that the 791 employee peak identified in the traffic analysis should be applied all year for employee housing demand), when the 55% occupancy rate is only used to estimate average annual occupancy. The comment states that the FEIR provides an insufficient explanation of occupancy assumptions; however, no new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

Regarding the comment that the FEIR does not adequately explain how the project's employees' commercial and service needs would be satisfied, see responses to comments 09-263, 012b-2, and 012b-10 in the FEIR.

Regarding the comment that the FEIR does not consider how the project might lead to further recreational and tourism growth in the project area or induce other resorts in the greater Tahoe area to expand, see responses to comments 09-275 and 09-276 in the FEIR. The comment characterizes the proposed project as a "first-of-its-kind year-round resort"; however, resorts in the area have for decades been adding summer time services and amenities in an effort to increase summer occupancy; golf courses, using ski lifts to support mountain biking, and the Heavenly Epic Discovery center are only a few examples. Although such amenities likely bring some additional visitors to the Tahoe-Truckee region, they are typically not a generator of single day visitors. The more important contributor to visitation is lodging so that those driving from regional populations centers (e.g., Sacramento, the Bay Area) have opportunities to stay in the area and access these amenities. The environmental effects of the lodging provided by the VSVSP, and associated population increases, including growth inducing effects, are addressed in the EIR.

06-42 Responses to comments 09-277 through 09-281 in the FEIR adequately respond to the commenter's concerns about the DEIR's analysis of the project's public services and utilities impacts, which are evaluated under Impacts 14-1 through 14-9 in the DEIR.

Regarding wastewater impacts, see responses to comments L4-32 through L4-35 (submitted by the Squaw Valley Public Service District) and responses to comment letter L5 (submitted by the Tahoe-Truckee Sanitation Agency) in the FEIR. Regarding the comment that the EIR does not adequately describe wastewater detention facilities, including locations, nor the environmental impacts associated with these facilities, see the responses to comments in the FEIR regarding the programmatic nature of the EIR, particularly response to comment 09-14, which specifically addresses this comment. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

Regarding the comment that the EIR does not adequately analyze the environmental impacts of constructing a new fire station, see responses to comments 09-13 and 09-278 in the FEIR, which specifically address this comment. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

06-43 Regarding impacts to recreational resources, see response to comment letter F2 (submitted by the U.S. Forest Service) in the FEIR for a discussion of trails in the area, including revisions to the DEIR. The comment further states that the EIR does not disclose the impacts of bringing more users to the existing recreational resources. This issue is specially addressed in responses to comments 09-275 and 09-280 in the FEIR. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

06-44 Regarding the DEIR's cumulative analysis for public services and utilities, see response to comment 09-281 in the FEIR, which adequately addresses this comment as well as the cumulative analysis in the DEIR (DEIR pages 18-45 and 18-46). No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

06-45 Responses to comments 09-283 through 09-291 adequately respond to the commenter's concerns about the project's energy efficiency, which is evaluated under Impact 14-4 in the DEIR. Further to the responses in the FEIR, see the Master Response regarding project-generated VMT in the Tahoe Basin in this document. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

06-46 The FEIR Master Response regarding the cumulative analysis (FEIR pages 3-63 to 3-66) adequately responds to the commenter's concerns about projects identified by the commenter that were not included in the analysis of cumulative impacts in the DEIR. The County believes that the addition of these projects to the list of projects used in the cumulative analysis would not change the conclusions of the EIR. The County is not obligated to analyze every potential project, nor continually update the analysis to respond to new project applications.

06-47 The comment reiterates comments provided on the DEIR and expresses disagreement with the response provided in the FEIR. However, the comment does not provide any new information regarding the content or analysis in the EIR. Therefore, no further response is provided here. See responses to comment letter 09 in the FEIR.

06-48 The comment states that the new or more sever significant impacts, potentially feasible mitigation measures, and alternatives to lessen these impacts have been presented by Sierra Watch and other commenters. Thus, the comment states that the DEIR should be revised and recirculated. However, for the reasons explained in responses to comments 06-1 through 06-47, above, and throughout the FEIR and this document, the EIR analysis is adequate and no changes to the EIR are necessary. Also, see the Master Response regarding recirculation in the FEIR.

The comment further states that because the project is inconsistent with the Placer County General Plan and SVGPLUO, project approval would violate the State Planning and Zoning Law and the Subdivision Map Act. However, for the reasons explained in response to comment 06-40, above, and throughout the FEIR and this document, the project would not be inconsistent with the Placer County General Plan or the SVGPLUO. The Placer County Board of Supervisors has responsibility over project approval and will consider this issue during project deliberations.

Finally, the comment states that the EIR is legally inadequate and cannot serve as the basis for project approval. However, for the reasons explained in responses to comments 06-1 through 06-47, above, and throughout the FEIR and this document, the EIR analysis is adequate and no changes to the EIR are necessary. See also response to comment 06-40, above, regarding the project's consistency with the Placer County General Plan and SVGPLUO. The Placer County Board of Supervisors will consider this issue during project deliberations.

06.10

Technical Memorandum
Review of Final Environmental Impact Report for the Village at Squaw Valley Specific Plan

June 10, 2016

Prepared for Sierra Watch
Prepared by: Tom Myers PhD
Hydrologic Consultant, Reno NV

Contents

1.0 Introduction

The final Village at Squaw Valley Specific Plan EIR (FEIR) reviews plans to develop the proposed Village at Squaw Valley Specific Plan (VSVSP), an expansion of hotel and residential development in Squaw Valley CA. The FEIR is a finalization of the draft EIR (DEIR) that had been prepared in 2015. The FEIR does not republish the DEIR but simply encompasses it as the final with changes specified in the FEIR. It includes a revised water supply assessment (WSA) as Appendix A. The FEIR also includes responses to comments provided to the DEIR, including Myers (2015a and b).

My comments on the DEIR (Myers 2015a and b) are incorporated herein by reference. I use the FEIR convention of labeling comments so herein any reference to a specific comment or response uses that nomenclature.

1

W

2.0 Baseline Conditions

The DEIR compares the project-induced conditions to baseline conditions. Because the project would occur along with other local growth, the 2040 WSA scenario includes project buildout along with other project growth in the valley. Baseline is "a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published ..." (DEIR, p 1-3). The DEIR determines baseline groundwater conditions as those that would occur due to pumping at the level of development that existed when Placer County issued the notice of preparation, or October 10, 2012, not the groundwater conditions as they exist on that date. Baseline is a groundwater model simulation of 2012 pumpage with 1992 through 2014 hydrology. My comment 08a-8 did not argue that the method used was inappropriate but rather about how it was used to compare to conditions after project buildout.

Comment 08a-44 more explicitly described the inaccuracy imparted by the way the DEIR presented baseline. "At locations with wells, baseline is a time series of water levels at those wells as affected by the pumping, and seasonal and annual variability in recharge. Between the wells, baseline is the groundwater level resulting from seasonal and annual recharge and as affected by the overlapping drawdown from the various pumping wells" (Myers 2015a, p 15). Because the after project buildout conditions include wells at different locations than during baseline, the analysis compares locations with and without wells for the two scenarios. This is a problem because the baseline assumes wells at different locations than the built-out project, resulting in a comparison of two different scenarios. To accurately evaluate the project's impacts, the EIR would need to compare identical wellfield scenarios with the only difference being baseline and with project pumping rates. Additionally, this is a problem because the sufficiency criteria is 65% of saturation which is approached only at pumping wells. Adding wells decreases drawdown at existing wells as simulated under baseline conditions which makes the comparison look like there would be less drawdown for project buildout conditions when reality is the aquifer is cumulatively stressed much more than during baseline conditions. Response 08a-44 is a rather lengthy defense of determining baseline based on the 2012 pumping conditions without recognizing that the comment addresses the fact comparisons between drawdown at a well is a comparison of inappropriate things.

Another problem with the response and the use of baseline is that it defends the use of 2012 conditions without considering whether those conditions are overdrafting the aquifer, or not. Although it does not equate 2012 conditions with pre-development or otherwise pristine conditions, the FEIR implicitly assumes that whatever environmental impacts current conditions cause are acceptable.

- A new suggestion is that average saturated thickness for 2012 conditions should be compared with average saturated thickness for with-project conditions (2040). For environmental impacts, the saturated thickness should be determined based on drawdown at a grid rather than just at the wells. This would eliminate issues with the placement and number of existing and new wells. For operations, it may still be necessary to compare saturated thickness at the wells.

3.0 Subterranean Stream

Myers (2015) made a case for the aquifer being a subterranean stream in Comment 08a-78:

> The WSA claims the groundwater is percolating rather than flowing in a subterranean stream (WSA, p 5-7), but does not support this contention. Groundwater flowing in the Olympic aquifer appears to be flowing in a subterranean stream, as described in the Garrapata decision, in that (1) there is a subsurface channel present, (2) the channel has relatively impermeable bed and bands, (3) the course of the channel is known, and (4) groundwater flows in the channel. As described above, the Olympic Valley aquifer is alluvium that lies in a glacial-carved valley of granitic bedrock. The granitic bedrock forms a subsurface channel and defines its banks. Williams (2001) shows profiles and cross-sections that show the maximum depth to bedrock is about 150 feet over its approximate one and half mile length and quarter mile width. Cross-sections also show alluvium confined on both side and underneath.

The response quotes the Garrapata decision states "[t]he burden of proof is on the person asserting that groundwater is a subterranean stream flowing through a known and definite channel" (Response 08a-78). That is precisely what the comment quoted above does. It also states "absent evidence to the contrary, groundwater is presumed to be percolating groundwater, not a subterranean stream" (Id.). The comments show how the bedrock that defines the valley forms the channel and effectively renders the aquifer a subterranean stream. The Garrapata decision does not specify that the recharge can only be from a stream.

The response also references response 08a-70 which notes that the California Department of Water Resources, in its Bulletin 118 (CalDWR 2004), has designated the basin as a groundwater basin without mentioning subterranean streams. It is not required that Bulletin 118 define it as a subterranean stream (Id.). In fact the Bulletin provides evidence supporting the basin being classified a subterranean stream. It refers to "the contact of valley deposits and hard rock valley walls and as downward migration of 'upper' aquifer groundwater" (Id.).

4.0 Simulation of Nine or Six Wells

At numerous points in my review of the DEIR, I raised the point that the WSA claimed they would develop six new wells to meet the demand but then simulated nine new wells (Myers 2015a).

> The WSA concluded six new wells would be necessary "to meet both project and new non-project demands" (DEIR, p 13-55), but they simulated nine potential new well locations in the groundwater model to "better show how the basin as a whole would function with increased demands" (Id.). Taylor et al. (2014) Table 2 shows nine proposed new municipal wells and their Table 3 shows that all of the wells, existing and new with one exception, were simulated to pump the same rate, 54.7 af/y; other entities' wells pump at other rates based on their specific conditions but mostly at rates proportional to their historic pumping. DEIR Exhibit 13-17 shows nine wells labeled as new (07/11, 09/14, 10/12, 15/07, 15/09, 16/10, 23/12, 38/54, and 45/53). The impacts shown in DEIR Exhibits 13-18 through 13-21 are also for all nine wells. The estimated drawdown would be less than if just six wells had been simulated. The simulation of this scenario with more pumping wells than will actually be used is that it spreads the impacts over more wells (Taylor and Reilly 2014). (Myers 2015a, p 14, comment 08a-43)

The FEIR mischaracterized this by suggesting the WSA actually claims there would be nine, not six, wells installed (FEIR, p 3-3). It also mischaracterized the issue. "The WSAs analyzed nine-well scenarios because it was expected that with more wells, saturation rates could be lower with some wells,

3

primarily because some of those wells would be located in less productive portions of the aquifer. By placing modelled wells in less productive portions of the aquifer, the modelling would be more likely to show if well saturation levels would fall below the identified threshold" (FEIR, p 3-10). While less productive portions of the aquifer may indeed require more drawdown, spreading the pumping rates over nine wells instead of six reduces the rate at any given well and therefore reduces the drawdown by spreading it more evenly over a larger area.

The problem with simulating nine wells rather than six is that nine wells spreads the drawdown over a larger area and minimizes the drawdown at any specific area. Larger drawdowns, even if over a smaller area could have more effect on depth-to-groundwater sensitive issues such as wetland vegetation and the amount of water drawn from the stream both short-term and long-term. This is because a deeper drawdown could cause a steeper gradient drawing water from the stream.

A six-well scenario completed for the FEIR, in response to these comments, revealed substantially more impact to the stream, with an increase in months with drying at three model cells in the meadow increasing from 13.6 to 16.2, 9.2 to 12.3 and 2.2 to 3.0 percent (FEIR, p 3-12). The depth to water also increased by an average at three model cells of 4.8, 3.6, and 2.9 inches and a maximum of 9.0, 8.4, and 8.2 inches, respectively (FEIR, p 3-13). These results also suggest an increase in depth to the water table beneath riparian and in wetland areas. The DEIR and FEIR acknowledge the effects of pumping on resources is potentially significant: "Therefore, the long-term impacts of groundwater pumping to reduced stream flow, increased channel drying, and reduced bank stability in the meadow reach of Squaw Creek would be **potentially significant** to aquatic habitat and fish populations" (FEIR, p 3-12, -13). The FEIR proposed mitigation measure 6-1c to accommodate these potentially significant impacts (Id.).

5.0 Recharge Simulation

Recharge replenishes the groundwater in the aquifer. In three ways the groundwater modeling as done for the WSA and FEIR/DEIR biases the estimation of impacts by limiting the simulated drawdown.

- Recharge model zone 9, which covers most of the western part of the project area and is mostly covered by development and parking lots, has 60% of the recharge as undeveloped parts of the valley.
- The distribution through the year allows far too much recharge during late fall/early winter when it can quickly replenish the late summer/fall deficits.
- Simulated recharge using the model as amended in 2014 is almost six times the amount it had in 2001 when it originally was conceptualized.

Comment 08a-38 noted that the modeling of recharge did not account for the impervious area in the west portion of the project area. The relevant part of the comment is:

> The groundwater modeling completed for the WSA and this DEIR ignores the impervious land cover and simulates a recharge zone all across the west basin, including on impervious developed areas; see the groundwater model review below. This clearly is in error. The recharge rates from this recharge zone did not reflect the fact the area is covered with impervious asphalt and buildings. It may be argued that the overall amount of recharge is the same but because of impervious area it should have been input to the model differently. (Myers 2015, p 12-13)

4

The response suggests that a parking lot would still accept 60 percent of the recharge rate that occurs in the eastern part of the project area. Comment 08-60c notes: "Zone 9 (Figure 7) covers the current development which means the model assumes recharge through the parking lots, which is impossible. The differing zones along the edges of the domain suggests simulation of mountain front recharge." (Myers 2015, p 23). Recharge zone 9 is mostly impervious parking lot and the response indicates that recharge through an impervious area would be 60% of that through a pervious area. The model allows more water to enter the groundwater system in the project area than would actually occur, and would therefore have more water recharged nearby to replenish the water pumped and to limit the impacts on Squaw Creek. These errors are critical because modeling recharge in areas where it does not occur, near the proposed new wells, can minimize the drawdown caused by those wells because the travel time from the recharge area to the wells is shorter.

- Simulating recharge through impervious areas near the proposed wells and the stream minimizes the simulated drawdown and inappropriately limits the predicted project impacts.

Comment 08-60d concerned the temporal distribution of recharge as simulated in the model and noted that allowing recharge during early winter would simulate a rapid recovery of groundwater drawdown that occurred in the late summer and fall. The climatology behind the comment is that early winter snowfall would not melt (with some exception) until the spring and therefore not recharge the groundwater until the snow melt really begins. The response generally was to claim their methodology was conservative:

> The temporal distribution methodology is conservative in that it results in snowmelt early in the winter and spring months at a time when potential recharge to the aquifer is abundant. The result is that more water leaves the model as runoff than would if snowmelt was lagged for longer periods, which would result in more potential recharge water availability later in the spring months. (Response 08a-60d).

This response uses circular logic. Allowing recharge to spread from late fall through the spring increases the time it is available. It is generally true that total recharge far exceeds the ability of the aquifer to accept it so if recharge commences earlier the aquifer will be full longer. If recharge did not begin in late fall, the groundwater would remain drawn down but eventually fill in spring when snowmelt truly begins.

- The response therefore ignores the issues and the ramifications of the error in the recharge modeling are that potential simulated dry periods in the streams are shorter than would otherwise occur.

Comment 08a-60e noted that currently simulated recharge into recharge zone 9 averages about 3900 af/y while in earlier editions of the model recharge was about 688 af/y. The response tries to explain this as being part of the natural variation, but misses the point that the 3900 af/y was an average from the entire time period. Total recharge as simulated with the current model is much higher than as simulated in the earlier versions. It has nothing to do with the error in Snotel data. Response 08a-61b also ignores the huge difference in the water balance.

- The effects are that the current model has much more recharge than earlier editions and therefore much more water available to meet pumping demands and flow to the stream. The

5

FEIR therefore substantially underestimates drawdown and drawdown effects to Squaw Creek because it overestimates the amount of water available.

Additionally, comment 08a-39 pointed out that the analysis failed to consider changes to recharge in the East Parcel, which is currently undeveloped. The changes could be important and the DEIR fails to consider them. The project would add "approximately 4.24 acres of impervious surfaces" (DEIR, p 13-53) in that area, but the DEIR dismisses this as not being "in a groundwater recharge zone of importance to the OVGB" (Id.). It is however a tributary to the Truckee River and this lost recharge will be lost to the Truckee River system. While it may just be runoff earlier during the season when the recharge would have occurred, the change in pervious area could change the timing of flow from current conditions; it could decrease baseflow in the Truckee River during the time of year that groundwater discharge to the river is most important. This could be manifestly important in years like this one (2015). Instead of considering it, the DEIR ignores this critical groundwater flow by stating it is not important. (Myers 2015, p 13).

6.0 Impacts to the Stream, Wetlands, and Riparian Vegetation

The primary potential impact caused by the project would be pumping-related groundwater drawdown and the effects on streamflow and riparian vegetation. The FEIR primarily compares the with-project drawdown to the baseline drawdown, which is already a substantially stressed condition (see section 2.0 regarding baseline). The FEIR predicts impacts but this and previous comment memoranda (Myers 2015a) suggest that the impacts will be far greater than predicted (Myers 2015, p 4-7). This section primarily responds to comments.

The DEIR suggested that pumping directly pulls only a small portion of the actual pumpage from the streams, a gross understatement of the effects pumping could have on the streams. Pumping causes a drawdown which begins to capture surface water. Comment 08a-28 concerns the aquifer tests which lasted for relatively brief periods. The results of these tests make it appear that the actual amount of water drawn from the stream was small because the tests only measured dewatering of the stream while pumping actually occurred. A well that pumps for 8 hours would create a drawdown and begin to draw water from the creek and would continue to draw from the stream to make up the lost storage in the groundwater. The response does not account for the water that is drawn from the creek to make up the drawdown left in the aquifer after pumping stops. The effect of this will be cumulative because the pumping is cyclical – there is likely residual drawdown from one cycle remaining when pumping the next cycle commences. The FEIR underestimates this cumulative drawdown by essentially ignoring that it occurs.

Comment 08a-11 requested more specific information regarding the dependence of habitat on groundwater to understand the impacts due to groundwater management. The response claims that construction would be the primary impact to wetlands. The response completely misses the important point that wetlands depend on the depth to groundwater which could be changed by the project (consider impacts 6-1, 6-8, and 6—13 in the DEIR).

Comment 08a-14 requested that the DEIR provide analysis based on groundwater model simulations of how long the groundwater table will be drawn below thresholds important for various vegetation types. The response suggests that hydrographs at various points should suffice on this point. However, hydrographs only contain the data necessary to determine the duration of time that groundwater levels

6

will be below given threshold levels. Therefore, the FEIR does not disclose the amount of time groundwater levels will be lower than critical threshold level. The actual hydrograph values must be manipulated to obtain the results requested here:

- To adequately disclose the nature of groundwater drawdown and its impact on the creek and habitat, the FEIR should provide frequency/duration graphs of how long the drawdown exceeds a given level, which will improve the assessment of thresholds. It is only with the original data that duration/frequency analyses or actual estimates that the time drawdown exceeds a threshold could be made.
- To supplement the understanding of the increased duration beneath a threshold, the comment requested a map be provided that could show the locations where groundwater drawdown would exceed a given depth. Rather than creatively consider the modeling output, the response suggests there are 228 unique conditions they could post. Although the request was for a map showing durations, the FEIR could provide a single drawdown map during perhaps the most stressed period, such as late summer during the driest year.

Comment 08a-14 also requested that the DEIR provide evidence or explanation as to why it can claim recovery from stressed conditions would occur. The FEIR provided no such evidence.

Comments 08a-15 to 08a-19 dealt with the amount of time that groundwater is below certain critical depths which could be assessed from frequency/drawdown graphs, but the responses essentially refer the reader to some hydrographs of groundwater level. As explained, a groundwater drawdown hydrograph may contain the output from which durations analyses could be completed, but it is simply not useful to make meaningful comparisons using the hydrographs. The time scale of the graphs is many years and the difference in time period that drawdown exceeds a critical level would be measured in weeks. This would be impossible to estimate from the hydrographs.

The FEIR therefore still fails to consider the additional time that drawdown exceeds critical levels. Quoting from the original comment:

> There are at least three significant thresholds affecting riparian vegetation – 3.3 ft bgs, 10 ft bgs, and 15 to 29 ft bgs, ... The water table in many model cells drops below these threshold in some years under baseline conditions but under WSA 2040 conditions the groundwater level will drop below the thresholds for longer time periods in more years .... To quantitatively assess the increased times the groundwater level is below the thresholds, the DEIR should present a drawdown frequency analysis for each monitored model cell showing the actual time groundwater levels go below various levels. The DEIR should also provide a graph showing the amount of time the drawdown exceeds a given drawdown to compare to known root depths. (Myers 2015, p 6-7)

Comment 08a-47 indicated that more data regarding losing and gaining for the stream's seven reaches instead of the stream as a whole was necessary to accurately understand the effects of pumping on Squaw Creek. Comment 08a-47 stated: "If the groundwater level is higher than the flow depth, groundwater will flow from the groundwater into the stream; if it is lower than the stream, stream water will flow into the aquifer. The DEIR should present simulated flux to/from the seven reaches rather than to the stream as a whole." (Myers 2015, p 16). Response 08a-47 suggests that groundwater model calibration by reach would be necessary to achieve this and that measured flow from the entire

7

period of record would be necessary to complete that calibration. The response inaccurately characterizes the data that could be used to much improve the model calibration. Synoptic stream surveys collected when the stream is at baseflow, during late summer when snowmelt has ceased and some stream reaches have gone dry, would identify which reaches are gaining and losing. Baseflow conditions are not substantially different from year to year and one year of data could be used so that calibration would capture the periods when groundwater/surface water relations are most important.

- The FEIR does not have sufficient data to provide reasonable estimates of the impacts the Project will have on the creek, as the response essentially acknowledges. A year of synoptic streamflow measurements to determine gaining and losing reaches (during baseflow conditions) and recalibrating the model to the data would allow for a useful impact assessment.

The DEIR also states that soil borings would be installed in wet meadow vegetation to assess whether the vegetation depends on groundwater during the late summer months (FEIR, p 2-47). The proposed plan is not specific so its value is difficult to assess. There is no definition or description of how dependence on groundwater would be established. Typically, groundwater dependence means that the vegetation depends on water emanating from the groundwater table. It is not necessary that the roots actually reach the water table but that they be close enough that exfiltration, or upward unsaturated flow, provide a source of water to the roots. Riparian vegetation often depends on groundwater, even though the roots are above the water table at least for some periods, that is flowing toward a stream. This applies to the riparian/stream/groundwater system near Squaw Creek. The initial baseline period of five years (Id.) is probably adequate, but there is no reason that the monitoring frequency should decrease to five-year intervals (FEIR, p 2-48) until 30% occupancy is achieved because pumping rates will be increasing and infrequent monitoring could miss threshold effects, such as drawdown increasing faster than it does for lower pumping rates. Monitoring also should not cease within five years after full buildout (Id.) because changes to riparian ecosystems can take time and because five years is not sufficient to have monitored through a significant drought period while at full development. Long-term monitoring should occur until a substantial drought occurs coincident with full water usage. This would be the only way to verify the model predictions of 2040 WSA conditions.

The FEIR substantially revised Mitigation measure 6-1c which includes a substantial amount of monitoring of groundwater-related impacts to riparian ecosystems (FEIR, p 2-46), but there remains substantial uncertainty which will limit its usefulness. Numerous comments had led to the revisions (Id.) which indicates the issues raised regarding groundwater pumping and drawdown effects on the stream could be substantial. Drying surface water resources is a primary potential negative impact of this project. Mitigation could be just documenting the degradation if adequate planning for it does not occur up front. After it is built, it would be difficult to choose no action or to substantially scale back the development plans. Therefore, it is essential that planning include the best data and analysis possible.

In addition to the specific comments above, it should be noted that the Lahontan Regional Water Quality Control Board (LRWQB) disagreed with the DEIR assessment that flow changes in the creek would be minor (Comments S4-11, FEIR, p 3.2.2-19). "Water Board staff disagrees with the current DEIR assessment. Improper management of groundwater extraction could dewater Squaw Creek, adversely affecting riparian vegetation resulting in increased creek erosion, increased creek temperatures, and decreased aquatic and terrestrial wildlife habitat. It is unclear how the stated mitigation measures will prevent or reduce these impacts to levels that are not potentially significant" (Id.). The response is to

8

refer to Response S4-7 which disagrees with LWRQB comment regarding the fact that the assessment applies only to a strict copy of the WSA pumping regime. Changes, either in total annual amount or seasonal distribution, could render the FEIR finding invalid. Basically, the FEIR responded to LWRQB that mitigation will accommodate any errors in the FEIR analysis, an argument LWRQB disagrees with, as do I.

7.0 Project Demand for Water

Planning demand from future development requires estimates of what the occupancy of that development will be. Comment 08a-41 raised questions regarding the occupancy rate used for the project because it is so low as to ultimately question the need for the project:

> Occupancy could be up to 80% higher than the estimated rate because the WSA assumes annual occupancy is 55.2% based on observed rates from 2009 through 2011, a significant recession period. Full occupancy would be 80% higher than the recession-era occupancy, therefore the water supply sufficiency estimates should be based on much higher potential demand even if the underlying estimates are accepted as accurate. Actual occupancy will likely be temporally variable, therefore the water supply sufficiency analysis, and analysis of environmental impacts for the DEIR, should consider future demand in a variable fashion. This means that the simulation of future demands should consider periods with occupancy much closer to full. (Myers 2015, p 13)

The response suggests occupancy according to information for six resort properties in Squaw Valley from 2008 through 2014. It does not address the appropriateness of using recession-era occupancy values, although response 08a-42 claims the recession ended in 2009. Though technically correct that GDP ceased its quarterly declines in 2009, the economy was not booming and many would argue it still is not. The point is that a good economy should result in a much higher occupancy. To justify the occupancy rates used for the analysis, the FEIR should present an analysis of Squaw Valley resorts during earlier pre-recession years or an analysis of industry-wide occupancy data to better justify their low occupancy value.

The FEIR presents an analysis with occupancy increased by 5%, but only for supply issues, not for the environmental impact (FEIR, p 3-15). The FEIR only compared the percent saturation to the 65% criteria and did not disclose simulated groundwater level hydrographs or any other information that would help to assess the environmental impacts. The FEIR provides four reasons as to why it did not consider the environmental impacts of the simulation with 5% higher occupancy (Id.).

The first is that the 5% higher rate, or 61.3% is not "reasonably foreseeable" (Id.), and refers to another section on occupancy rates. That section claimed that in a review of occupancy at "other comparable facilities in the U.S., annual occupancy has peak above 55 percent in isolated years" (FEIR, p 3-67) with a "high of 61.6 percent one year between 2002 and 2014 in one data set" (Id.). The FEIR neither provides this data nor references the source so it has not adequately disclosed the basis for limiting occupancy rates. Using unreferenced data to justify a conclusion is not defensible. The second essentially repeated reason one in that they accept the claim that occupancy data was accurate. The third relies on water being a "public health issue" (FEIR, p 3-15) so that it was only appropriate to consider whether the system can handle a short-term peak. The fourth dealt with emissions.

9

The FEIR therefore has not justified not considering a significantly higher occupancy rate, at least for a period of time.

- The FEIR could be grossly underestimating impacts if demand spikes above what is projected. The FEIR should present the predicted impacts on the environment, including wetlands, riparian vegetation, and streamflow, of pumping at significantly higher rates for at least a year.

8.0 Water Supply Sufficiency

The FEIR assesses the sufficiency of the water supply by comparing the saturated thickness at the wells to a threshold of 65%. The threshold was operational meaning that the wells could easily provide the needed water if drawdown at the well allowed 65% of the aquifer to remain saturated. This criteria says nothing about environmental impacts. Response 08-45a essentially confirms this and does not justify the use of 65%. The comment primarily was of whether the DEIR should have used the value 65%:

> The DEIR specifies that maintaining 65% is acceptable ... for water supply in the valley. Simulations as shown for project-only conditions (DEIR Exhibit 13-19) show the average saturation remains above 80% and only for a few wells in a few years falls below 80%. Their significance criteria based on 65% saturation are not reached. This of course depends on the model being accurate.
>
> The 65% saturation criteria is an operational threshold for maintaining the ability to pump the water from the wellfield and has nothing to do with maintaining any environmental conditions. Taylor et al. (2014) decided on 65% after a literature search because that was the deepest drawdown recorded in the past at existing wells onsite and it did not cause a problem at any wells as far as they knew. 65% is simply the necessary saturation to maintain well pumping efficiency and is meaningless with respect to basinwide groundwater management. The guidance has nothing to do with maintaining a yield or not causing other deleterious impacts to the basin, such as lowering discharge to streams and springs. It also does not consider the cumulative effects of overlapping drawdown cones. In other words, the drawdown from one well will affect nearby wells so that the drawdown at any point is a summation of drawdown from each well. It is possible that the saturation could fall below 65% due to these overlaps.
>
> The DEIR cites the WSA in concluding that the increased groundwater pumping "would not cause any of the wells to drop below 65 percent saturation thickness for more than three consecutive months or more than four times during the study period" (DEIR, p 13-55). As noted, this has little to do with environmental effects and it also depends on the simulation pumping from nine rather than the proposed six wells. The implication is that if development occurs as proposed in the WSA, the impacts would be less than significant, and only if "different wellfield construction or operations are ultimately implemented, groundwater availability and wellfield operations could be adversely affected" (DEIR, p 13-63). By design, if the WSA well construction plans are followed, they will be different from those simulated in the model. (Myers 2015, p 15-16)

Response 08-45a does not consider whether the criteria has anything to do with environmental impacts or basinwide groundwater management. The response states that the "model simultaneously simulates pumping from all wells" so the effect of overlap is accounted for. The responder misunderstood the comment. Because of overlap, it is possible the cumulative drawdown from two or more wells away from the actual wells could be more critical, especially from an environmental perspective. If that

cumulative impact is near Squaw Creek, it could increase the amount of water drawn from the creek or increase the drawdown beneath the riparian vegetation. Exhibits 13-23 to 13-27 in the DEIR are a hydrograph of water level directly beneath the stream, but does not discuss what these figures actually mean or disclose any additional factors about the riparian vegetation or wetlands near the stream. For example, those exhibits (13-23 to 13-27 in the DEIR) show that the length of time the water level is below the stream bottom will increase with increasing development, with the hydrograph at West Cell G (Figure 1) providing a good example. The green line, representing baseline conditions, is consistently within the red lines, for 2040 WSA and With Project conditions, at the point they cross the line representing stream bottom. This means the time water level is below the stream bottom is less for baseline conditions. The increase in time the stream is dry is more important than the actual level below the stream bottom because once the stream is dry the depth to water is not important. The FEIR fails to analyze the increased time the stream is dry. Because drying occurs annually, the changes are increases in time the stream is dry. The best analysis would be a statistical comparison among scenarios.

Additionally, depth to water is important under the riparian areas away from the streams. The FEIR does not present any water level graphs for areas away from the stream, therefore the FEIR has not disclosed impacts related to drawdown under the riparian areas.

By considering only the percent saturation at the wells and relying on unanalyzed water level graphs for the stream, the FEIR has not responded to this comment. The issue of cumulative drawdown away from individual wells affecting the environment has also not been considered at any point away from the streams.

11

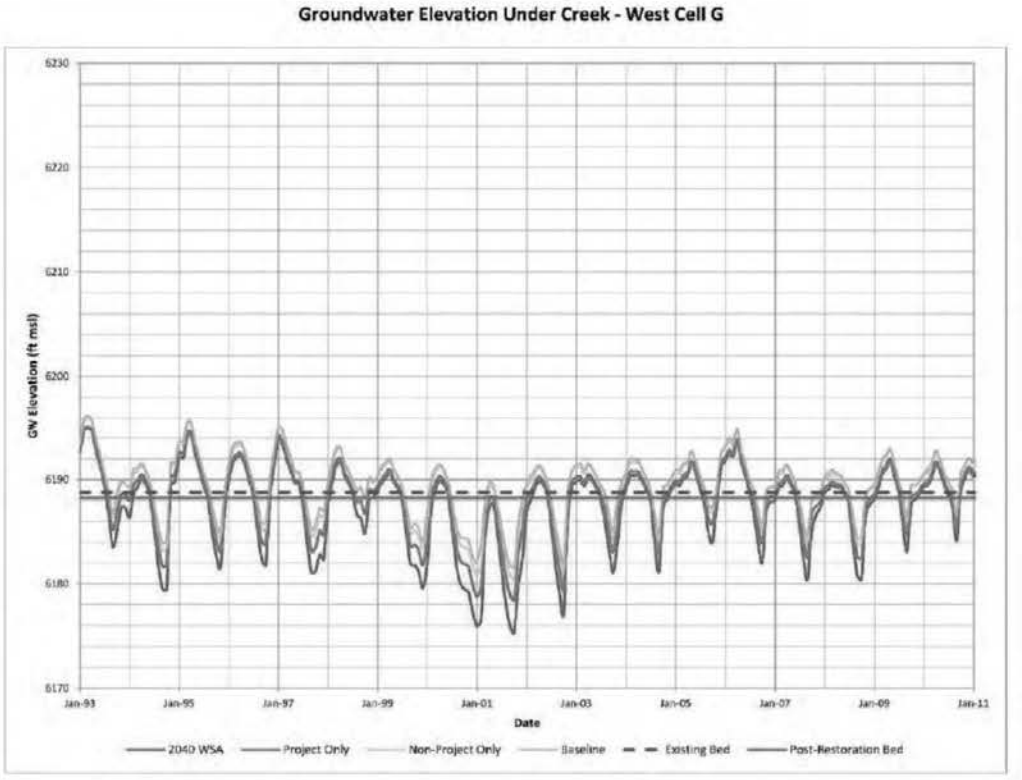


Figure 1: Hydrograph of simulated groundwater elevation under the Creek at West Cell G, from Exhibit 13-24, DEIR.

9.0 Monitoring

Adequate project monitoring is necessary to verify whether the predicted impacts were accurate and to determine whether additional mitigation may be necessary as called for in the FEIR. LRWQB notes that monitoring is not mitigation (Comments S4-7, FEIR, p 3.2.2-18). Modeling cannot be a substitute for monitoring because monitoring is used to verify that the modeling was correct. Models predict impacts that would occur due to stresses on a system not currently occurring, and monitoring verifies whether those predictions were correct. Mitigation verifies the predicted changes and should provide additional mitigation if the observed impacts go beyond the predicted impacts. If monitoring shows that the model underestimated impacts, it should be incumbent on the mitigation plan to provide remedies for the additional impacts. If modeling were actually a substitute for monitoring, there would really be no need to monitor. See also the discussion in Section 6.0.

Comment 08a-21 requested that monitoring continue after full project build-out at least until there has been a significant drought; the response relies on there being a drought during the period that build out is occurring.

10.0 Groundwater Model Review

Most comments on the groundwater model were of details related to modeling techniques, but three aspects the model however clearly could have led to underestimated or inaccurate impacts. The first concerned the simulation of recharge as discussed above in the Recharge section. The second and third concern the method of determining model parameters, including hydraulic conductivity and overall calibration methods.

Comment 08a-60g raised questions about the method used to calibrate conductivity values around the model domain, noting especially how the parameters formed shapes that would not be expected in geology. The modeler had used pilot point methodology that caused obviously incorrect patterns in the model parameters. Figures 10 and 11 in the quote refer to figures in Myers (2015a):

> The resulting parameter fields do not resemble hydrogeologic patterns, however, as can be seen on the circular patterns shown on Figures 10 and 11. Figure 10 shows circular areas with horizontal conductivity exceeding 100 ft/d in the middle of areas with conductivity much less than 100 ft/d. Vertical anisotropy has fewer circular zones, but those that occur in layers 2 and 3 are areas where the model will simulate very little vertical flow. It is also very unusual to have the very high anisotropy in surface layers (layer 1 in Figure 11) because surface formations tend to be sorted rather than exhibiting continuous layers. (Myers 2015a, p 26)

Response 08a-60g did not address how geology created circles of similar aquifer parameters. The response simply noted that the model was calibrated to observed groundwater level data. The model is not unique however, and the calibration may be the best possible based on the conceptualization provided by the modeler. It may be possible to calibrate the model better using parameter zones based on actual geology, such as gradations in lithology or changes in formation. The comment requested a better description of how pilot points were actually used, but the response did not provide one. It is difficult to conclude how this affects the predicted impacts other than to illustrate the model parameters are likely very inaccurate.

Comment 08a-61a noted that a presentation of calibration results for a groundwater model should include a presentation on how well the simulation matches observed groundwater levels and flows. The model report had failed to present information on flows. The response basically just claims that water levels are sufficient. The model is clearly not unique, because groundwater levels could be matched perfectly for a vast range of flows just by changing the conductivity values. Matching observed and simulated fluxes is as important as matching head values (Anderson and Woessner 1992), but the FEIR response ignores that fact.

The ramification is that the model report is just not sufficient to provide the reader with confidence in the ability of the model to replicate existing conditions.

13

11.0 References

Anderson MA, Woessner W (1992) Applied Groundwater Modeling: Simulation of Flow and Advective Transport. Academic Press.

California Department of Water Resources (CalDWR) (2004) California's Groundwater Bulletin 118, Olympic Valley Groundwater Basin 6-108

Myers T (2015a) Technical Memorandum, Review of Draft Environmental Impact Report for the Village at Squaw Valley Specific Plan. Prepared for Sierra Watch. July 13 2015.

Myers T (2015b) Technical Memorandum, Review of Water Supply Assessment, Village at Squaw Valley, Prepared for Sierra Watch. July 13 2015.

Taylor C, Hundt D, Williams D (2014) Technical Memorandum: Sufficient of Supply Assessment for Village at Squaw Valley and Other Growth, Squaw Valley California. Todd Groundwater, Alameda CA. June 25 2014

791281.1

14

06.10 Tom Meyers, PhD
on Behalf of Sierra Watch

June 10, 2016

The same commenter provided similar comments on the water supply assessment (WSA) prepared for the County by the Squaw Valley Public Services District (SVPSD) during the DEIR comment period and all comments were responded to in the FEIR.

The WSA was independently prepared by the SVPSD in fulfillment of California Water Code Section 10910-10915. The WSA was prepared by three firms expert in water demand and supply analysis and groundwater modeling; Farr West Engineering, HydroMetrics and Todd Groundwater. The WSA was first released in July 2014 and was included as Appendix C of the DEIR. In response to comments on the DEIR and in consideration of additional drought-related data, the WSA was updated and released in July 2015 and included as Appendix A of the FEIR, along with supporting data in Appendices B1-B5 of the FEIR. A detailed response to water comments, including by this same commenter, was provided in Section 3.1.1 of the FEIR; the response includes 16 pages of analysis and explanations.

By virtue of its unique nature—one cannot "see" groundwater—the analysis is conducted by using observable data and computer modeling. The modeling reflects expert analysis that forecasts an outcome, based on decades of past years' data and current observations in the project area. The forecast projects expected outcomes over the next 25 years based on wellfield configurations, changing weather and climate conditions, other forecasted development, and project demands. Section 15144 of CEQA states that EIRs involve some degree of forecasting, and "(W)hile foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclosed all that it reasonably can." The WSA, and hence, this EIR has gone to great lengths to do this very thing.

Because the analysis is based on modeling and forecasting, other experts may not agree that the analysis or the model is correct. However, CEQA recognizes that there may be disagreement among experts and that the lead agency will ultimately exercise its expertise and authority as lead agency to determine the technical adequacy of its expert analysis. The WSA was prepared by experts and is being critiqued by an expert hired to find flaw with it. "Disagreement among experts does not make an EIR inadequate…" (CEQA Guidelines Section 15151). In the instance here, this commenter goes to great lengths to identify new disagreements with the analysis in the FEIR. The FEIR already includes a thorough response to disagreements by this expert, and an additional point-by-point response to comments on the FEIR is not provided here. It would be pointless to continue to argue over details of modeling that attempts to predict the future when a reasonable, independently-prepared, well-documented and expert approach to modeling has already been undertaken. Moreover, the comments restate and provide misinterpretations of similar comments. For instance, the comments regarding occupancy assumptions argue, contrary to facts, that the assumptions are not supported by references, are based on recession data, and underestimate project use. See Section 3.1.11 of the FEIR and particularly 3-68 through 3-71.

Importantly, the County recognizes that the analysis is based on modeling, and that the behavior of the groundwater table may not follow precisely the results predicted in the WSA. Consequently, several mitigation measures are included in the FEIR that require close and frequent ongoing monitoring of groundwater behavior and potential effects, and adjustments if unanticipated impacts occur. See, for instance, Mitigation Measure 6-1a in the FEIR concerning biological effects and Mitigation Measure 13-4 concerning monitoring and adjustments. In light of this, no further response is provided.

M R O
ENGINEERS
660 Auburn Folsom Rd.
Suite 201B
Auburn, California
95603
PHONE (916) 783-3838
FAX (916) 783-5003

06.18

May 25, 2016

Ms. Laurel L. Impett, AICP
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, California 94102

Subject: ***Mountain Adventure Camp Trip Generation Estimate***
Village at Squaw Valley Specific Plan, Placer County, California

Dear Ms. Impett:

As part of our continuing review of the transportation and circulation analyses completed with respect to the proposed Village at Squaw Valley Specific Plan in Placer County, California, MRO Engineers, Inc. has evaluated several documents describing the development of the trip generation estimates for the project component known as the Mountain Adventure Camp (MAC). According to the Project Description, the MAC will be a 90,000 SF recreation facility with the following features:

- Indoor/outdoor pool system,
- Water slides,
- Indoor rock climbing,
- 300-seat movie theater,
- 30-lane bowling alley, and
- Multi-generational arcade.

06.18-1

As we noted in our June 25, 2015 letter, it is reasonable to expect that the MAC, with its extensive and challenging recreational opportunities, will become an attraction in its own right. Despite this, the DEIR (Table 9-18) indicated that under peak winter conditions it will generate a grand total of 58 guest vehicle-trips over the course of an entire Saturday, with 4 guest vehicle-trips in the Saturday AM peak hour and 6 guest vehicle-trips in the Sunday PM peak hour. In the peak summer Friday PM peak hour, the DEIR says the MAC would generate a total of 6 guest vehicle-trips.

Response to Comment 08d-8 (p. 3.2.4-333) in the Final Environmental Impact Report (FEIR) documents a revised set of trip generation estimates for the MAC, which were developed in the August 19, 2015 memorandum described below and are addressed further in this letter. According to the FEIR, in the winter the MAC would generate a total of 150 daily trips, 4 Saturday AM peak-hour trips, and 14 Sunday PM peak-hour trips. In the summer, it would generate 140 daily trips and 19 Friday PM peak-hour trips. No analysis was performed using these revised trip generation figures.

We understand that Shute, Mihaly & Weinberger has received from Placer County several documents describing the derivation of the trip generation estimate for the MAC, including:

- A May 6, 2016 memorandum from Adrienne Graham, AICP, to Alex Fisch of the Placer County Planning Department (Subject: "Requested reference material: H&LA Study")

- A May 5, 2016 memorandum from Gordon Shaw, PE, AICP, of LSC Transportation Consultants, Inc., to Chevis Hosea of Squaw Valley Real Estate, LLC (Subject: "Additional Information on MAC Trip Generation")
- An August 19, 2015 memorandum from Gordon Shaw, PE, AICP, of LSC Transportation Consultants, Inc., to Chevis Hosea of Squaw Valley (Subject: "Mountain Adventure Camp Trip Generation")

06.18-1 (cont.)

We have performed a detailed review of these documents, which revealed that the derivation of the MAC trip generation estimates included significant errors. Because of these errors, the volume of traffic associated with the MAC has been seriously underestimated. The results of our review are set forth below.

1. The Trip Generation Estimates are Based on Erroneous Assumptions Regarding the Size of the Mountain Adventure Camp

All three of the documents listed above refer to a fourth document entitled, *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center* (Hotel & Leisure Advisors, July 23, 2012). According to the Graham memorandum, Hotel & Leisure Advisors (H&LA) was retained, ". . . to estimate visitation patterns and volume, pricing, overall feasibility, and other components of the MAC."

06.18-2

The Graham memorandum also presents an excerpt from the H&LA study (specifically, page D-9 of that study), along with the notation that:

> *The original Adventure Center was proposed at 120,000 square feet so the attached excerpt from the* [H&LA] *report was based on this size. The size of the current MAC was reduced to 90,000 square feet in January 2014. Therefore, current visitation metrics informing the traffic analysis for the EIR were extrapolated and reduced from the H&LA analysis to better represent the smaller facility with smaller visitor capacity.*

Similar statements concerning the size of the MAC are contained in both LSC memoranda. In particular, the May 5, 2016 document states:

> *A figure of 422,000 attendees per year was drawn from the HLA report, as first is presented in the table on page D-9 for long-term levels for a 120,000 square foot facility.*

Referring to the H&LA market study, the August 19, 2015 LSC memo says:

> *This study was conducted for a 120,000 square foot facility.*

In reality, however, the H&LA study did not address a 120,000 square foot (SF) facility. Instead, it studied an 80,000 SF facility.

Attachment A contains a copy of page D-9 from the H&LA study, which was attached to the May 6, 2016 Adrienne Graham memorandum. Page D-9 is a tabular representation of a spreadsheet entitled, "Projected Attendance and Indoor Waterpark Revenue – Proposed Indoor Waterpark and Adventure Center, Squaw Valley." Near the bottom of that page, we have highlighted in yellow a line that specifies the size of the facility being considered. As shown, the facility is assumed to be 80,000 SF, not 120,000 SF.

To ensure that this was not simply a typographical error (i.e., that the analysis was still based on 120,000 SF, and that this line is just misstated), we have replicated the calculations on that line of the H&LA spreadsheet, which provides an estimate of the "Projected Indoor Attendance Per SF."

- If, for example, we divide the annual attendance for 2015 (396,000) by 80,000 SF, we get 5.0 attendees/SF, as shown on the table. If it were truly for a 120,000 SF facility, we would divide 396,000 by 120,000 and get 3.3 attendees per SF.
- Similarly, for the year 2020, if we divide the annual attendance (422,000) by 80,000 SF, we get 5.3 attendees per SF, which also matches the value shown in the table. Annual attendance of 422,000 divided by 120,000 SF would result in 3.5 attendees per SF.
- These numbers are important, because H&LA uses them as confirmation of the validity of their patronage forecasts. Page D-10 of the H&LA report says:

  Our projected attendance per square foot ranges from 5.0 in the first year to 5.3 in the third year of the analysis. Our estimate is within the range of other indoor waterparks as shown on the following table.

  The referenced table provides values for "attendance/SF" for six other locations, with values ranging from 3.8 to 7.5. With regard to the MAC, only the attendance/SF values for an 80,000 SF facility fall within the range presented in the table on page D-10. As noted above, if the H&LA analysis had truly addressed a 120,0000 SF MAC, the corresponding values would have been 3.3 or 3.5 attendees/SF, both of which are outside that range.

2. The H&LA Patronage Estimates Were Improperly Factored From 120,000 SF to 90,000 SF

The patronage numbers from H&LA page D-9 were then factored downward by LSC, with the intent being to reflect a 90,000 SF facility. That is, the values derived on H&LA page D-9 were multiplied by a factor of 0.75 (i.e., 90,000 / 120,000) to adjust the estimates for the erroneous 120,000 SF facility to represent the proposed 90,000 SF facility.

Because the H&LA analysis was actually for an 80,000 SF facility, the patronage estimates should have been adjusted upward to develop estimates for a 90,000 SF facility. Specifically, the patronage values on H&LA page D-9 should have been multiplied by a factor of 1.125 (i.e., 90,000 / 80,000).

As described in the May 5, 2016 LSC memorandum, the 422,000 annual attendance shown on H&LA page D-9 was multiplied by 0.75 to derive the annual patronage of 316,500 attendees, which they rounded down to 315,000. What they should have done is adjust upward from 80,000 SF to 90,000 SF – i.e., multiply 422,000 by 1.125, which results in an estimate of 474,750 patrons per year, which would be rounded to 475,000 patrons per year.

This error trickles down through the entire trip generation process so that all of the MAC trip generation estimates are substantially understated.

3. The Estimates Were Incorrectly Adjusted for On-Site Hotel Guests

The August 19, 2015 LSC memo describes the derivation of the number of annual MAC patrons who will be guests at the Squaw Valley lodging facilities. As noted in item 2. in that memorandum:

The trip generation depends upon the proportion of guests that fall into the following three categories: those that are part of a Squaw Valley hotel package, those that are visitors staying in other lodging around the region, and those that are

> *residents. The* [H&LA] Market Feasibility Study *identifies the proportions of 64 percent, 26 percent, and 10 percent, respectively.*

However, these are not the percentages that were actually employed in estimating the volume of traffic associated with the MAC. Instead, according to the LSC memo:

> *. . . the number of hotel package guests were held constant and the reduction in total guests* [at the MAC] *taken from the two other categories (proportionate to the 26 percent and 10 percent factors). This yields resulting proportions for the small (currently proposed) facility of 86 percent for hotel package guests, 10 percent for the other regional visitors, and 4 percent for regional residents.*

In other words, the estimated number of hotel package guests at the MAC is based on the initial patronage estimate, which they believed related to a 120,000 SF facility. Instead of reducing the number of hotel package guests to reflect the smaller facility, they arbitrarily held this number constant and reduced the number of off-site, trip-generating guests sufficiently to match the overall total estimated patronage. In doing so, they artificially constrained the volume of traffic associated with the facility (since none of the on-site lodging guests are assumed to generate a vehicle-trip).

06.18-3 (cont.)

There is simply no basis for suggesting that the number of hotel package guests at the MAC would suddenly increase from 64 percent of the total to 86 percent of the total patronage as the size of the MAC facility is reduced. And, correspondingly, there is no basis for reducing the trip-generating portion of the total patronage from 36 percent to 14 percent.

To put this in perspective, consider the fact that if the initial patronage estimate had been for an even larger facility (150,000 SF, perhaps), under this approach, the on-site lodging guests would have fully consumed the capacity of the MAC when the patronage estimates were adjusted downward to match the actual facility size. This would have led to the conclusion that the MAC could accommodate no patrons from off-site, and the facility's trip generation would be zero.

To illustrate this, Table 1 presents patronage estimates for a 150,000 SF facility and the proposed 90,000 SF MAC. Assuming that the MAC had initially been assumed to be 150,000 SF, Table 1 shows that it would have total daily patronage of 2,334 guests. Breaking that total down using the proportions defined by H&LA indicates the following daily patronage by category:

- Hotel package guests: 1,494 guests (64 percent),
- Other Tahoe-region visitors: 607 guests (26 percent), and
- Tahoe-area residents: 233 guests (10 percent).

But, as shown, the 90,000 SF MAC would only generate total daily patronage of 1,394 guests. Thus, the approach taken by LSC, in which they held the number of hotel package guests for the larger facility constant, would suggest that the number of those guests would actually exceed the total projected demand at the proposed 90,000 SF facility. It would also suggest that no patronage could occur from off-site, and that no guest vehicle-trips would be associated with the MAC. We believe this demonstrates that the approach used in developing the MAC trip generation estimates is faulty.

MRO ENGINEERS

Table 1
Daily Patronage Estimate Comparison
Mountain Adventure Camp
Initially Assuming 150,000 SF and Holding Hotel Package Guests Constant

	Mountain Adventure Camp Size			
	150,000 SF		90,000 SF	
Annual Patronage	527,750[1]		315,000[2]	
Peak Winter Monthly Patronage (February)[3]	58,025		34,650[1]	
Daily Patronage – TOTAL[4]	2,334		1,394[1]	
Daily Patronage By Category	No.	%	No.	%
Hotel Package Guest[5]	1,494	64%	1,494	107%
Other Regional Visitor	607	26%	0	0%
Resident	233	10%	0	0%
TOTAL	2,334	100%	1,494	107%

Notes:
1 Factored from estimate for 120,000 SF MAC presented in Hotel & Leisure Advisors, *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center*, July 23, 2012, p. D-9.
2 Source: LSC Transportation Consultants, Inc., Memorandum from Gordon Shaw to Chevis Hosea, "Additional Information on MAC Trip Generation," May 5, 2016.
3 11 percent of annual patronage, per LSC May 5, 2016 memorandum.
4 Assuming MAC is open 6 days per week, per LSC May 5, 2016 memorandum.
5 Number of hotel package guests is held constant at 1,199, based on a 120,000 SF facility. (Source: LSC Transportation Consultants, Memorandum from Gordon Shaw to Chevis Hosea, "Mountain Adventure Center Trip Generation," August 19, 2015.

We also wonder if the same approach would have been taken if they had realized that the H&LA patronage estimates were for a smaller MAC facility and, therefore, needed to be factored upward to develop estimates for the 90,000 SF MAC. That is, would they still have held the number of on-site lodging guests constant when factoring the overall estimates upward? And would they then have shown that the proportion of on-site hotel package guests was less than the 64 percent value indicated in the H&LA analysis and that the off-site, trip-generating patrons was a greater percentage of the total?

The ramifications of this faulty approach are further illustrated on Table 2. Shown there are patronage estimates for MAC facilities of four different sizes:

- 60,000 SF,
- 90,000 SF (based directly on information developed by LSC),
- 120,000 SF (using the annual patronage estimate developed by H&LA), and
- 150,000 SF.

The process used to develop these estimates was taken directly from the May 5, 2016 LSC memo from Gordon Shaw to Chevis Hosea, as follows:

- The annual patronage values were all factored from the 422,000 patrons per year value presented in the H&LA market feasibility study. As in the LSC analyses, this estimate was mistakenly assumed to represent a 120,000 SF facility. The annual patronage estimate for a 90,000 SF facility was taken directly from LSC's May 5, 2016 memo.
- The peak winter monthly patronage represents 11 percent of the annual patronage, per LSC's May 5, 2016 memo.
- As in the LSC analysis, the total daily patronage was based on the assumption that the facility would be open six days per week.
- The breakdown of daily patronage by category followed the approach employed by LSC in developing the patronage estimates and trip generation estimates for a 90,000 SF MAC:
  - The percentages shown for a 120,000 SF facility were taken from page D-9 of the H&LA market feasibility report. Those percentages indicate the following breakdown of MAC patrons:
    - Hotel package guests: 64 percent,
    - Other Tahoe-region visitors: 26 percent, and
    - Tahoe-area residents: 10 percent.
  - For all other MAC sizes, the number of hotel package guests was held constant at 1,199, and the number of other Tahoe visitors and Tahoe-area residents was proportionally reduced. Thus, as shown in Table A in the August 19, 2015 LSC memo, the various percentages were altered for a 90,000 SF facility, as follows:
    - Hotel package guests: 86 percent,
    - Other Tahoe-region visitors: 10 percent, and
    - Tahoe-area residents: 4 percent.

The daily patronage estimates for a 60,000 SF MAC are particularly interesting. As shown, the number of hotel package guests (which is held constant from the analysis of a 120,000 SF facility, per LSC) significantly exceeds the total daily patronage estimate of 934 patrons. This is, of course, illogical and unreasonable. Moreover, it suggests that no off-site patrons would be accommodated and the number of guest vehicle-trips generated by the MAC would be zero.

MRO ENGINEERS

Table 2
Daily Patronage Estimate Comparison
Mountain Adventure Camp – Various Sizes

	Mountain Adventure Camp Size							
	60,000 SF		90,000 SF		120,000 SF		150,000 SF	
Annual Patronage	211,000		315,000[1]		422,000[2]		527,750	
Peak Winter Monthly Patronage (February)[3]	23,210		34,650[1]		46,420		58,025	
Daily Patronage – TOTAL[4]	934		1,394[1]		1,868		2,334	
Daily Patronage By Category	No.	%	No.[1]	%[1]	No.	%	No.	%
Hotel Package Guest[5]	1,199	128%	1,199	86%	1,199	64%	1,199	51%
Other Regional Visitor	0	0%	139	10%	483	26%	820	35%
Resident	0	0%	56	4%	186	10%	315	14%
TOTAL	1,199	128%	1,394	100%	1,868	100%	2,334	100%

Notes:
1 Source: LSC Transportation Consultants, Inc., Memorandum from Gordon Shaw to Chevis Hosea, "Additional Information on MAC Trip Generation," May 5, 2016.
2 Source: Hotel & Leisure Advisors, *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center*, July 23, 2012, p. D-9.
3 11 percent of annual patronage, per LSC May 5, 2016 memorandum.
4 Assuming MAC is open 6 days per week, per LSC May 5, 2016 memorandum.
5 Number of hotel package guests is held constant at 1,199, based on a 120,000 SF facility. (Source: LSC Transportation Consultants, Memorandum from Gordon Shaw to Chevis Hosea, "Mountain Adventure Center Trip Generation," August 19, 2015.

It is also interesting to consider the daily patronage estimates for a 150,000 SF MAC, as shown in the right-most columns of Table 2. Again following the LSC methodology and holding the number of hotel package guests constant, those individuals represent only 51 percent of the total patronage. The proportion of off-site patrons would increase to a total of 49 percent, and the number of guest vehicle-trips would substantially increase.

With this in mind, Table 3 presents the results of a similar analysis illustrating the effects of recognizing that the H&LA patronage estimates actually represented an 80,000 SF facility, as described above. Factoring up the annual patronage of 422,000 for the assumed 80,000 SF MAC to the currently-proposed 90,000 SF facility indicates annual patronage of 475,000 visitors for the larger facility. Daily patronage would be 2,100 visitors.

When the daily patronage is broken down into categories (and the number of hotel package guests is held constant at 1,199), the number of off-site, trip-generating guests is estimated to be 901 (compared to 669 for the 80,000 SF MAC). Those off-site guests represent 43 percent of the total

daily patronage, and the proportion of hotel package guests is 57 percent (compared to the H&LA value of 64 percent for an 80,000 SF facility).

Table 3
Daily Patronage Estimate Comparison
80,000 SF vs. 90,000 SF Mountain Adventure Camp

	Mountain Adventure Camp Size			
	80,000 SF		90,000 SF	
Annual Patronage	422,000[1]		475,000[2]	
Peak Winter Monthly Patronage (February)[3]	46,420		52,250	
Daily Patronage – TOTAL[4]	1,868		2,100	
Daily Patronage By Category	No.	%	No.	%
Hotel Package Guest[5]	1,199	64%	1,199	57%
Other Regional Visitor	483	26%	651	31%
Resident	186	10%	250	12%
TOTAL	1,868	100%	2,334	100%

Notes:
1 Source: Hotel & Leisure Advisors, *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center*, July 23, 2012, p. D-9.
2 Factored from 80,000 SF to 90,000 SF (i.e., 422,000 X (90,000/80,000) = 474,750, rounded to 475,000)
3 11 percent of annual patronage, per LSC May 5, 2016 memorandum.
4 Assuming MAC is open 6 days per week, per LSC May 5, 2016 memorandum.
5 Number of hotel package guests is held constant at 1,199, based on 120,000 SF facility. (Source: LSC Transportation Consultants, Memorandum from Gordon Shaw to Chevis Hosea, "Mountain Adventure Center Trip Generation," August 19, 2015.

Finally, Table 4 compares the LSC trip generation estimates (as presented in Table A of their August 19, 2015 memorandum) to a set of estimates that we prepared. The approach to developing both sets of estimates was similar, with the following two exceptions:

- Our estimates recognize that the H&LA patronage values were based on consideration of an 80,000 SF MAC facility, whereas the LSC numbers mistakenly assume that the H&LA values were for a 120,000 SF facility.
- We did not artificially hold the number of hotel package guests constant, whereas the LSC analysis arbitrarily did so.

As shown, our estimates of daily trips are almost three times higher than the LSC estimates:

	MRO	LSC
• Winter:	442	153
• Summer:	386	138

Further, our estimates of winter peak-hour trips are slightly over four times higher than the LSC estimates:

	MRO	LSC
• AM:	17	4
• PM:	60	14

Finally, our summer peak-hour estimates are about three times higher:

	MRO	LSC
• AM:	14	5
• PM:	52	19

Table 4 also shows trip generation estimates based on average trip rates presented in the Institute of Transportation Engineers *Trip Generation Manual* (9th Edition, 2012). Although these trip rates are based on relatively small sample sizes, they provide an interesting reality check on the MAC trip generation estimates used in the Village at Squaw Valley traffic impact analysis.

In the AM peak hour, the ITE information indicates that 80 vehicle-trips would result from construction of the MAC. In contrast, the LSC analysis suggests that this number would be 4 or 5, depending upon season. In the PM peak hour, the ITE rates indicate that 173 trips would be generated by the MAC, compared to the LSC estimates of 14 or 19.

Even if the LSC estimates are factored to eliminate consideration of the substantial percentage of on-site patrons (who are assumed to generate zero trips), the LSC analysis would indicate that a total of no more than 36 AM peak-hour trips and 136 PM peak-hour trips would be made. In comparison, the ITE data suggest 80 AM peak-hour trips and 173 PM peak-hour trips.

CONCLUSION

This letter report has documented the results of our detailed review of the trip generation estimates associated with the Mountain Adventure Camp component of the proposed Village at Squaw Valley project. Our review indicated that the volume of traffic associated with the MAC has been substantially underestimated. Consequently, the traffic impacts associated with the MAC and, in fact, with the entre proposed project have been understated.

MRO ENGINEERS

Table 4
Trip Generation Estimate Comparison

	MRO Engineers, Inc.		LSC Transportation		
	Winter (February)	Summer (July)	Winter (February)	Summer (July)	ITE[1]
Annual Patronage	422,000 for an 80,000 SF MAC				
Patronage Adjusted for Size	475,000[2]		315,000[3]		
Monthly Patronage	52,250	42,750	34,650	28,350	
Daily Patronage	2,102	1,609	1,394	1,067	
Daily Patronage by Type					
Hotel Package	64% 1,345	64% 1,030	86% 1,199	86% 918	
Other Regional Visitor	26% 547	26% 418	10% 139	10% 107	
Resident	10% 210	10% 161	4% 56	4% 43	
Average Vehicle Occupancy					
Hotel Package	3.5	3.5	3.5	3.5	
Other Regional Visitor	3.5	3.5	3.5	3.5	
Resident	2.4	2.4	2.4	2.4	
Non-Auto Mode Split					
Hotel Package	100%	100%	100%	100%	
Other Regional Visitor	18%	8%	18%	8%	
Resident	18%	8%	18%	8%	
Total Daily Trips					
Hotel Package	0	0	0	0	
Other Regional Visitor	256	220	65	56	
Resident	144	123	38	33	
TOTAL	400	343	103	89	
Employee Trips	43	43	43	43	
TOTAL DAILY TRIPS	442	386	153	138	
Peak-Hour Trips % of Daily					
AM inbound 2.7%	12	10	3	4	51
AM Outbound 1.1%	5	4	1	2	29
AM Total 3.8%	17	14	4	5	80
PM inbound 1.7%	8	7	2	2	88
PM Outbound 11.7%	52	45	12	16	85
PM Total 13.4%	60	52	14	19	173

Notes:
[1] Source: Institute of Transportation Engineers, *Trip Generation Manual*, 9th Edition, 2012.
[2] Adjustment from 80,000 SF assumed in H&LA patronage estimate to 90,000 SF proposed size.
[3] Adjustment from erroneous 120,000 SF assumption to 90,000 SF proposed size.

MRO ENGINEERS

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.

Neal K. Liddicoat, P.E.
Traffic Engineering Manager

MRO ENGINEERS

ATTACHMENT A

Projected Attendance and Indoor Waterpark Revenue
Proposed Indoor Waterpark and Adventure Center, Squaw Valley

(Source: Hotel & Leisure Advisors, *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center, July 23, 2012, p. D-9*)

Proposed Indoor Waterpark and Adventure Center, Squaw Valley
Subject Usage Levels

D-9

Projected Attendance and Indoor Waterpark Revenue
Proposed Indoor Waterpark and Adventure Center, Squaw Valley

	Calendar Years					
	2015	2016	2017	2018	2019	2020
Subject Squaw Valley Hotel Packages						
Subject Property Occupied Rooms	170,273	175,381	180,642	180,642	180,642	180,642
Waterpark Package Occupied Rooms	63,852	65,768	67,741	67,741	67,741	67,741
[redacted]						
Number of Waterpark Visitors	255,409	263,071	270,963	270,963	270,963	270,963
Local Day Pass Visitors						
Number of Waterpark Visitors	39,044	40,996	42,636	42,636	42,636	42,636
[redacted]						
Other Tahoe Region Overnight Leisure Visitors						
Number of Waterpark Visitors	101,756	104,809	107,953	107,953	107,953	107,953
[redacted]						
Total						
Subject Property Attendance	396,209	408,876	421,553	421,553	421,553	421,553
Subject Property Attendance (rounded)	396,000	409,000	422,000	422,000	422,000	422,000
[redacted]						
Statistical information						
Projected Indoor Attendance Per Day Open - 317	1,249	1,290	1,331	1,331	1,331	1,331
Available Indoor Capacity Per Day	2,000	2,000	2,000	2,000	2,000	2,000
Usage Percentage	62%	65%	67%	67%	67%	67%
Projected Indoor Attendance Per SF - 80,000	5.0	5.1	5.3	5.3	5.3	5.3
Demand segmentation:						
Subject Squaw Valley Hotel Packages	64%	64%	64%	64%	64%	64%
Local Day Pass Visitors	10%	10%	10%	10%	10%	10%
Other Tahoe Region Overnight Leisure Visitors	26%	26%	26%	26%	26%	26%

Source: Hotel & Leisure Advisors

HOTEL & LEISURE ADVISORS H&LA

06.18 MRO Engineers, Inc.
Neal K. Liddicoat, P.E., Traffic Engineering Manager
May 25, 2016

06.18-1 The comment summarizes the findings of the DEIR and FEIR regarding MAC trip generation, and identifies memoranda that were reviewed by the commenter. The comment suggests that there are errors in the MAC trip generation, and refers to the following comments. See responses to comments 06.18-2 and 06-18.3, below.

06.18-2 The comment is not correct. The Hotel & Leisure Advisors (H&LA) study[1] assumed that the MAC would be 120,000 gross square feet and 80,000 net square feet. At 90,000 gross square feet, as currently proposed, the MAC would be 75 percent as large as the MAC analyzed in the H&LA study. Therefore, it was appropriate for LSC to reduce the attendance estimates.

06.18-3 It is important to recognize that the MAC is intended, first and foremost, as an amenity to guests at the VSVSP. It is an important proposed amenity toward the goal of providing a four-season resort and its capacity is limited.

The number of hotel package guests is based on the number of bedrooms provided by the VSVSP, not the size of the MAC. Hotel package guests would have priority to MAC tickets with the primary marketing and sales of tickets occurring as part of a hotel package. During the ski season, tickets to the MAC would also be offered as an optional additional charge to daily ski passes, likely at a discount rate. However, persons choosing to purchase this option would already be at the resort and the trips associated with those patrons are accounted for in the day-skier traffic counts. If the size of the MAC were larger, the number of hotel guest packages would remain constant, but the proportion would be smaller and more outside guests could be accommodated. With a smaller MAC, the proportion of hotel guest packages is appropriately higher, and the proportion and total number of other Tahoe-region guests and Tahoe-area residents is smaller than if the MAC were 120,000 gsf.

As explained in the LSC memorandum of August 19, 2015[2], the average number of peak winter daily visitors to the MAC was estimated to be 1,394, of which 1,199 would be hotel package guests. Summer months had overall lower levels of daily attendance. This estimate assumes the MAC would be 90,000 gsf, which is consistent with the proposed VSVSP. Calculations for facilities of different sizes are not needed to understand the trip generation associated with the proposed MAC. Nonetheless, it should be noted that, as stated above, the decision to hold the number of hotel package guests constant is not arbitrary as it is based on the business program for the project as a whole, and would not change, although the proportions of guests/outside visitors would change if the MAC square footage changed. It should be further noted that trip rates for the MAC are calculated based on the peak operational condition and are then added to the peak visitation trip generation rates modelled for the remainder of the project, including day skier visitation.

Regarding the comparison to Institute of Transportation Engineers (ITE) trip generation rates[3], the ITE rates are based on only two sites (in Idaho and New Hampshire), and neither site includes adjacent lodging. The analysis provided in the VSVSP EIR is specific to the

[1] Hotel & Leisure Advisors. 2012 (July 23). *Market Feasibility Study and Financial Analysis Report for the Proposed Indoor Water Park and Adventure Center*.
[2] LSC Transportation Consultants, Inc. 2015 (August 19). Memorandum to Chevis Hosea, Squaw Valley. Table A.
[3] Institute of Transportation Engineers. 2012. *Trip Generation Manual* (9th Edition).

characteristics of the proposed MAC and surrounding VSVSP development, including hotel rooms, as well as to the observed travel patterns in the Squaw Valley area.

The analysis in the EIR is based on substantial evidence specific to this project.

WORKING DRAFT

07

Memorandum

From: Isaac Silverman, Staff Attorney at Sierra Watch
To: Placer County Planning Commission
Re: Staff Report on the Village at Squaw Valley Specific Plan
Date: 8/10/2016

I) INTRODUCTION

KSL's proposed Village at Squaw Valley Specific Plan would transform Squaw Valley with development of size, scale, and type never before seen in North Lake Tahoe. Project features would include: acres of condo hotel highrise development, a total of 1,493 new bedrooms, a 90,000 square foot 96' tall indoor water park, and 21 large timeshare houses in the mouth of Shirley Canyon. As the county's own environmental analysis made clear by revealing 20 significant and unavoidable impacts, (and project opponents including Sierra Watch believe it would in fact have several more) it is a project whose impacts, good or bad, everyone agrees will be felt throughout the greater Tahoe-Truckee Region for years to come.

This proposal has generated significant local and regional opposition. This is evidenced by:

i. a record-breaking number of comments from agencies, jurisdictions, organizations, and individuals on the Draft Environmental Impact Report—97% percent urging rejection of the plan or pointing out flaws in the analysis,
ii. a letter of opposition from more than 60 local businesses and virtually every local, and multiple regional and national, environmental organizations,
iii. the recommendation to deny the project from Placer County's own Squaw Valley Municipal Advisory Committee,
iv. the record breaking attendance and overwhelming opposition at public hearings,
v. dozens of letters to the editor and opinion pieces from concerned citizens and organizations in the Sierra Sun, Moonshine Ink, Auburn Journal and Reno Gazette Journal

1

WORKING DRAFT

vi. Well over 200 emails of opposition sent directly to the Board of Supervisors, and
vii. more than 3,600 signatures to our petition to Keep Squaw True.

Although this memorandum is not yet complete due to the compressed timeline between the release of the staff report and tomorrow hearing this memorandum is not yet complete. We intend to add sections further discussing environmental impacts identified in this report and also discuss the proposed statement of overriding considerations prior to any consideration of this report by the Board of Supervisors. Further proofreading will also be performed and I apologize in advance for any typographical errors that you may encounter.

However, the reasons outlined below independently demonstrates the irresponsibility and illegality of KSL's proposed Village at Squaw Valley Specific Plan. As a result we strongly disagree with staff's recommendation, and we urge the Commission to recommend denial of the Project as proposed.

II) REQUESTED ENTITLEMENTS AND ACTIONS

1) ***Misleading and/or incomplete description of the effect of project approval***

Although it is impossible to understand without reading Appendix to the report, a recommendation of approval would recommending that the County grant the Developer vested development rights to build out the entirety of their Proposed Specific Plan.

The report states that "approval of KSL's proposed Specific Plan, and the related entitlements and actions would implement zoning, policies and procedures for approval of future project-level entitlements to implement build out of the plan area over an anticipated 20 to 25 year period."[1] It then goes on to provide an accurate list of the certifications, land use plan amendments, rezones, and approvals required that would be required to "approve" the project. It then concludes this section by stating that:

> No project level entitlements are requested as part of this Specific Plan approval request. Project level entitlements would be requested separately following adoption of the specific plan. The Large Lot Vesting Tentative

[1] Staff Report at 19.

WORKING DRAFT

Map would carry no development rights and would be a financing tool only.[2]

Based on this description, even a conscientious reader would be hard pressed to understand the depth and breadth of the rights that approval of this specific plan would provide.

Make no mistake though, approving this Specific Plan and Development Agreement would represent a commitment by the county to permit ANY development that is consistent with the guidelines provided the Village at Squaw Valley Specific Plan and associated entitlements and actions described in this report. This is confirmed by the text of the development agreement itself. It reads, in pertinent part, that "The Entitlements will enable Developer to develop the Property as described in the Specific Plan."[3]

07-7 (cont.)

There would be no future discretion for the county to deny any conforming project and the only future environmental review would be a reference to the existing environmental impact report certified in this approval packet. To be crystal clear, once approved the county would be legally bound to approve 1,493 new bedrooms in a mixture of condo hotels and fractional homes, a 90,000 square foot indoor water park, and all other elements described by the Specific Plan and development agreement. Failure to do so would constitute a breach of legally binding contract and would entitle the owner of those rights to damages that would easily run into tens if not hundreds of millions of dollars.

III) ANALYSIS OF PROJECT CONSISTENCY AND RELATED TOPICS IN STAFF REPORT

1) Consistency with the Placer County General Plan and the Squaw Valley General Plan: An Analysis of Select Issues Ignored in the Staff Report

07-3

The report presents an incomplete and at times inaccurate description of a set of issues related to compliance with the SVGPLUO. This section focuses on a set of the most egregious violations of county plans and land use ordinances that are not even mentioned in the Report.

[2] Id.
[3] Staff Report Appendix I at

3

WORKING DRAFT

A) Relevant provisions of the Placer County General Plan ignored by the Staff Report

Although our recent letter on the Final Environmental Impact report contained the same analysis, it's important to include this description of the most egregious violations of the Placer County General Plan in any review of the report as well. The three worst ways that the Project would violate the Placer County General Plan would be:

i) *General Plan Policy 3.4.7*

Because the Project would result in severe, unmitigated traffic congestionand degraded intersection and roadway operations, we explained that the Project would be flatly inconsistent with General Plan Policy 3.A.7, which calls for the County to maintain levels of service ("LOS") D or higher on roadways and at intersections.[4] As we noted, Policy 3.4.7 does allow exceptions to the LOS standards, but requires that factors such as increased air and noise pollution, general safety, and quality of life be taken into account.[5] Rather than acknowledge this conflict, and more importantly, resolve it, the applicant proposes to adopt a new policy, Policy CP-1, that would make LOS F an acceptable LOS within the Specihc Plan area.[6] This proposed policy change represents bootstrapping at its best. The policy amendment would do nothing to change the fact that the Project would create gridlock conditions on area roads and intersections. It simply absolves the County of any responsibility for facilitating such degraded conditions. But the reality of congested roadways, increased traffic noise, increased air pollution and greenhouse gas emissions, and risks to public safety (due to protracted emergency response and evacuation times) would remain. Put simply, the applicant's proposed approach demonstrates a disturbing disregard for the County's General Plan provisions intended to protect the environment and human health and well-being.

The FEIR manufactures a spurious rationale when it suggests that the Project's circumvention of this protective policy is somehow

[4] FEIR at3.2,4-432 (comment no.09-223); DEIR at9-59-63.
[5] See General Plan Circulation Element at71,72.
[6] See FEIR at3.2.4-334 (response no. 08d-12; FEIR at3.2-4-533 (response no.9-223); FEIR at 3-89.

4

WORKING DRAFT

acceptable because of the State legislature's passage of SB 743. Specifically, the FEIR states that LOS and its relationship to environmental impacts has always been a policy issue and in certain instances LOS D, E, or F may not be considered significant because some agencies consider traffic congestion acceptable.[7] The EIR authors are correct that, in certain circumstances, degraded levels of service are considered acceptable. This is largely because mitigation for increased vehicular delay often involves increasing roadway capacity which, in turn, may increase auto use and emissions, and discourage alternative forms of transportation. The purpose of SB 743, however, is to encourage mixed-use transit-oriented development, to reduce GHG emissions, and to support development of multimodal networks. It is particularly disingenuous that the VSVSP EIR looks to SB 743 as a rationalization as to why traffic gridlock in a mountainous area should be considered acceptable. The proposed Project is not transit-oriented development, is virtually I00% auto-oriented, and would actually increase, not decrease, GHG emissions.

07-3 (cont.)

Moreover, the EIR errs because it does not evaluate the environmental impacts that would result from the adoption of Policy CP-1. Because this policy would make LOS F acceptable at intersections in the Specific Plan area, traffic would no longer be a constraining factor for future development proposed within the study area. In other words, future land use projects in the area could generate massive amounts of traffic, yet the impacts caused by this traffic would inevitably be considered a less than significant land use impact. The VSVSP EIR ignores this reasonably foreseeable scenario.

Consequently, the document must be revised to evaluate the ways in which removing this obstacle to development could foster additional growth. The revised EIR must also evaluate the environmental impacts that would result from this growth including, but not limited to, traffic, air quality, noise, GHG emissions, biological resources, water supply and water quality.

[7] FEIR at3.2.4-533 (response no 09-223).

5

WORKING DRAFT

ii) *General Plan Policy 3.A.8*

Like the FEIR, the DEIR also glosses over the Project's glaring inconsistency with General Plan Policy 3.4.8. This policy states:

"The County shall work with neighboring jurisdictions to provide acceptable and compatible levels of service and joint funding on the roadways that may occur on the circulation network in the Cities and the unincorporated area."

The FEIR reasons that this policy "simply requires that the County work with neighboring jurisdictions on solutions for the circulation network" and that the
policy does not preclude development that would affect roadways in neighboring jurisdictions.[8] This conclusion is absurd. The intention of the General Plan is unambiguously to avoid local and regional impacts to area roadways. This policy clearly indicates that the County and neighboring jurisdictions are to work together to achieve acceptable and compatible levels of service.

The FEIR provides no evidence that the County or the applicant has made any attempt to work with local jurisdictions to provide acceptable levels of service. Consequently, the proposed Project would result in significant impacts in contravention of this policy.

iii) *General Plan Policy 1.G.1*

As we explained, it is indisputable that the Project is inconsistent with Policy 1.G.1, which calls for the County to support the expansion of winter ski and snow play areas where the transportation system capacity can accommodate the expanded uses and where environmental impacts can be adequately mitigated. The Project would result in numerous significant and unavoidable transportation impacts, but the FEIR authors boldly assert that the Project would not result in exceedance of transportation system capacity.[9] Not only does

[8] FEIR at3.2.4-534 (response no 09-224
[9] FEIR at 3-59.

6

WORKING DRAFT

the FEIR's assertion belie common sense, it is also contradicted by the DEIR itself. The DEIR uses volume to capacity as the significance threshold for determining impacts to roads and intersections.[10] A volume-to-capacity ratio is a measure that compares a roadway demand (vehicle volumes) with roadway supply (carrying capacity). The volume of traffic from the Project would exceed the capacity of certain roadway segments and come close to exceeding the roadway or intersection capacity at other locations.[11] Nor can the DEIR credibly assert that the Project's myriad significant traffic impacts have been adequately mitigated because, as mentioned above, the EIR ultimately concludes that these impacts would be significant and unavoidable.[12]

B) Important provisions of the SVGPLUO where the project is clearly inconsistent

i) The SVGPLUO ordinance establishes a maximum peak overnight population in Squaw Valley of 11,000 to 12,000 people. Although it is not discussed in the report, the county estimated that, after buildout, the Squaw Valley would only reach a max peak occupancy of 9,483. Unfortunately, the methodology used to calculate this peak occupancy is fatally flawed. The flaw relates to an assumed occupancy of only 2.1 people per single family home during peak occupancy times.[13]

Although this data is from a credible source, the 2010 census, that data refers to the number of residents living in the single family homes, and common sense tells us that this bears little relation to how many people will be there overnight on New Year's Eve or the Fourth of July when the guests and family are home for the holidays and the large stock of short term vacation rentals are fully booked. Assuming, conservatively, that the average occupancy of these 2, 3, and 4 bedroom homes is 5 people on peak nights, there would be 3,007 more people staying in Squaw Valley on peak nights than calculated

[10] DEIR at9-32.
[11] See e.g., DEIR at9-49 (Table 9-20, showing that Squaw Valley Road between Squaw Creek Road and the village area would operate at V/C ratio of | .02), DEIR at 9-64 (Table 9-23, showing that state highway segments such as SR 28 east of SR 89 would operate at a V/C capacity of 0.96).
[12] DEIR at 9-57 to 9-63.
[13] DEIR at 5-2 to 5-3.

7

WORKING DRAFT

07-3 (cont.)

by County Staff and disclosed in the Draft Environmental Impact report. And, significantly, that total would rise to 12,490 people exceeding the maximum overnight occupancy limit called for in the SVGPLUO.

2) Consistency with the Placer County General Plan and the Squaw Valley General Plan: An Analysis of Issues Addressed in the Staff Report in the Order Presented

The report presents a set of issues, discussed in turn below, that each touch on whether the proposed Village at Squaw Valley Specific Plan is consistent with applicable land use plans and zoning ordinances. As this section will make clear, this analysis is incomplete and, at times, misleading.

A) Destination Resort Concept

07-4

i) The Report asserts that the specific plan fulfills the 1983 Squaw Valley General Plan and Land Use Ordinance's objective to "establish a planning framework to ensure that Squaw Valley is developed into a top quality, year-round, destination resort…without adversely impacting the unique aesthetic and environmental assets of Squaw Valley."[14] The discussion goes on to highlight various plan features like the proposed indoor water/amusement park that would draw summer visitors, the increased lodging to entice more people to stay, or the creation of bus stop, that are broadly consistent with provisions in the Squaw Valley General Plan Land and Land Use Ordinance. It also concludes, without any reference to the 20 significant and unavoidable impacts, or the actual policies on the subject in the Squaw Valley General Plan and Land Use Ordinance that project that would meet those plan objectives to "conserve and enhance the environmental assets of the Valley."[15] This analysis amounts to an explanation of how this plan could fulfill the first half of the objective, development of Squaw Valley into a "top-quality, year-round, destination resort" while ignoring the second half that objective, to avoid "adversely impacting the unique aesthetic and environmental assets of Squaw Valley."

[14] Staff Report at pg. 25.
[15] Staff Report at pg. 26.

8

WORKING DRAFT

Had they analyzed the second half of that sentence it would have revealed a project that the county's own analysis states has 20 significant and unavoidable environmental impacts ranging from the obstruction of mountain views,[16] increasing gridlock on area roads,[17] destruction of historic Olympic buildings,[18] violation of county noise standards,[19] significant greenhouse gas emissions.[20] Due to existing and planned developments most of these impacts would also create cumulative significant impacts.[21] It's difficult to understand how this level of impact conserves and enhances the environmental impacts of the Valley. As a more detailed discussion of these, and other impact areas would show, they, quite simply, do not.

O7-4 (cont)

B) Squaw Creek Restoration

i) The proposed restoration improvements of the trapezoidal channel and Olympic Channel, if pursued independently of the rest of the development proposal, would likely have some merit. These details are provided in the report.[22] What is not mentioned or discussed is the fact the "restored" trapezoidal channel would be newly flanked by 35' tall parking garages and, as will be discussed in further detail in the discussion of the Water Supply Assessment and hydrologically driven environmental impacts, would run dry significantly sooner each year than under existing conditions. Furthermore, money can, should, and is being raised to restore this creek whether or not the development moves forward.

[16] FEIR at 2-52 and DEIR at 2-4 listing Impact 8-1: Adverse effect on a scenic vista (construction and operations as experienced by many viewer groups, Impact 8-2: Substantially degrade the existing visual character or quality of the site and its surroundings (construction), Impact 8-3: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway (construction), Impact 8-5: Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (operations). Normally construction impacts can be considered temporary but considering the 25 year (plus two automatic 5 year extensions) construction period this would mean that many current residents would be dead, and children who aren't yet born in Squaw Valley would have left for college before these impacts have gone away.

[17] DEIR at 2-4 listing Impact 9-2: Impacts to Placer County intersections, Impact 9-3: Impacts to Caltrans intersections, Impact 9-4: Impacts caused by vehicular queuing at Caltrans intersections, Impact 9-5: Impacts to Caltrans highways. These would be caused by adding an average of 3,400 car trips per day with peak days in excess of 8,400 car trips per day, all on system that is already beyond capacity.

[18] DEIR at 2-4 listing Impact 7-1: Demolition of historically significant buildings.

[19] DEIR at 2-4 listing Impact 11-1: Construction noise impacts.

[20] FEIR at 2-83 listing Impact 16-2: Exceeding mass-emission thresholds for CO2

[21] DEIT at 2-5 listing 11 significant and unavoidable cumulative impacts.

[22] Staff Report at 26.

9

WORKING DRAFT

C) Park and Recreation Improvements

i) The report cites a "mix of passive onsite and offsite recreation improvement." Onsite this consists of an interpretive trail alongside an improved trapezoidal channel, and two trailheads with flush restrooms along with improved sewer facilities at the existing park. Offsite the Project proposes to "construct significant enhancements to the existing network of hiking, biking, and horseback trail on ski resort and U.S. Forest Service Property located above the valley floor."[23] In addition, they would pay $2.7 million in park and recreation fees administered by the county for use in Olympic Valley.[24]

07-5

The problem with this rosy picture is that Forest Service has stated, quite clearly and vocally, in comments to the DEIR that development of any new trails on Forest Service Lands would require their approval, that this approval would require a separate environmental analysis under the National Environmental Policy Act, and that under no conditions would they consider approval of the trails proposed by the applicant to enter the Granite Chief Wilderness Area or connect to the Pacific Crest Trail.[25] What's left of the "significant enhancements" to the trail network are repairs to existing trails that are already functioning quite well, some trailhead bathrooms, and a speculative, unfunded unstudied, realignment of one trail in Shirley Canyon that could only go forward with the permission of the US Forest Service.

D) Employee Housing

i) The report states the project would provide housing for up to 201 of the estimated 574 FTE positions they project that the project would create.[26] This is less than the 50% requirement included in the general plan, the balance of which would be met in other methods, most likely

[23] Staff Report at 28.
[24] Id.
[25] FEIR at 3.2.1-8 to 3.2.1-11 Letter from Joanne Robique, District Ranger
[26] Staff Report at 28.

10

WORKING DRAFT

by the payment of in-lieu fees to the County.[27] In addition, they have committed to make a one- time contribution of $500,000 to the County for workforce housing development[28].

Simply put, this project would exacerbate the well documented affordable housing crisis in the Tahoe-Truckee area. To get a sense of the problem, the Tahoe-Truckee Community Foundation recently released a 2016 Regional Workforce Housing Needs study that revealed, among other key indicators in the region "49.1 percent pay greater than 30 percent of their income to housing costs, while 26.1 percent pay greater than 50 percent." [29]

O7-5 (cont.)

Into this already dire situation the project would add, by the county's own estimation, 751 employees[30] while providing enough actual housing for only 200. That would leave 550 more, predominantly seasonal and low wage, employees to seek housing in a market that is so bad that the local newspaper, Moonshine Ink, has an ongoing series entitled "HOUSING CRISIS | Out of Reach: Tahoe's housing tales show the severity of the region's housing crisis."[31] The situation also prompted Nevada County Supervisor Richard Anderson, who represents District 5 including the Truckee Region to, after summarizing these same figures, comment on the Draft Environmental Impact Report that "having hundreds of service wage employees compete for affordable housing in a supply-constrained region would seem a situation that will lead only to heartbreak."[32] Consider finally, the insignificance of the $500,000 one time contribution to employee housing when the median cost of single family home in the region during the six months ending in November 2015 was 538,000.[33]

[27] Id.
[28] Id.
[29] Truckee-Tahoe Regional Workforce Housing Needs Assessment, August 2016, Executive Summary at 5. Available at: http://www.ttcf.net/wp-content/uploads/2016/01/FINAL-RHS-Executive-Summary.pdf.
[30] DEIR at 9-34.
[31] Series available at: http://www.moonshineink.com/news/housing-crisis-out-reachcharacterized as
[32] FEIR at 3.2.3-3 to 3.2.3-5.
[33] Truckee-Tahoe Regional Workforce Housing Needs Assessment, August 2016, Executive Summary at 5. Available at: http://www.ttcf.net/wp-content/uploads/2016/01/FINAL-RHS-Executive-Summary.pdf.

11

WORKING DRAFT

E) Structured Parking

i) The Report includes a relatively detailed description of how the project would conform to the Squaw Valley General Plan and Land Use Ordinance requirement to provide a minimum of 3,100 parking spaces available for day skiers at all phases of project buildout.[34] While this is true, it fails to answer a much more important question, namely, would this project continue to provide enough parking to accommodate existing and new users? And if not, who is getting kicked out? The answer, based on all evidence is no, and it would be the day skiers (many of whom are Placer County Residents) who would be out luck. That's because the County's own analysis states that the plan would only provide enough parking spaces, 3,100, to accommodate the 5th busiest ski day of the season under an very optimistic set of assumptions concerning (only 10,663 skiers, 18% transit or drop-off, and 2.2 people per vehicle).[35] So it's actually planning for total failure on at least 4 days each seasons.

07-3 (cont.)

This is compounded by the fact that Chevis Hosea, vice president for development for Squaw Valley, acknowledged that as many as 5,000 cars squeeze into current surface parking on the busiest days.[36] On the busiest day this season all 5,000 spaces were occupied and there were enough additional cars trying, and failing, to find parking that officials were forced to shut down the entrance to Squaw Valley Road.

Because the hotel guests have a separate parking supply, the loss of approximately 1,900 parking spaces would only exclude locals, day trippers, and out of town visitors who, for any number of reasons, chose not to stay in Squaw Valley.

Notably, we are not the only ones to notice or point out existing parking issues in Squaw Valley. Numerous comment including, including a scathing one from Squaw Valley Public Service District Fire Chief Pete Bansen, pointed out problems. In his letter Chief Bansen wrote that in his opinion "virtually ALL of the current issues

[34] Staff Report at 29.
[35] DEIR at 9-7.
[36] Personal Communication to David Stepner Feb. 21 2013

12

WORKING DRAFT

O7-5 (cont.)

associated with traffic and circulation in Squaw Valley—and the ripple effects on SR 89, SR 28, Donner Pass Road, West River Street, and Eastbound I-80, have their basis in poor planning and management/operation of parking at Squaw Valley Resort."[37] This plan would take that situation and make it worse.

F) Compatibility with Adjacent Land Uses

i) The report admirably walks through all of the proposed land uses and provides some discussion of how these use types relate and are largely compatible with adjacent zoning and development.[38] By focusing simply on the type of development it is able to paint a rather rosy picture. Again, this analysis misses the mark. What's missing is that it is not necessarily the type of use of the various lots that makes KSL's proposal (evidenced by the long list of significant and unavoidable impacts) incompatible with adjacent land uses, it's the *intensity* of those proposed uses. Some condo-hotel development is likely compatible with adjacent residential, commercial and recreational uses, but not acres of highrise condo hotel development containing a total of 1,500 bedrooms. Some type of Mountain Adventure Camp is probably compatible, but not the 96' tall 90,000 square foot indoor water park that's proposed here. A discussion of the type of use, without discussing the intensity of those uses, is, well, useless.

O7-6

Furthermore, it's worth pointing out that the increase in Conservation Preserve and Forest Recreation land uses claimed herein is entirely illusory and misleading. All of the land near the existing Village that would be rezoned in this manner is either Squaw Creek or an associated wetland or riparian zone (lots 23-26), simply too steep to build on (lot 29), or in an avalanche hazard zone (lots 20 and 21). These are all areas where environmental and public safety laws, along with common sense, make development virtually impossible.[39] In contrast, the land that would be taken out of conservation preserve and forest recreation and developed (portions of lots 18 and 19 and 1A and 4 & 9) is flatter and free of these habits. The result is a swap of

[37] FEIR at 3.2.7-4.
[38] Staff Report at 29 to 31.
[39] Specific Plan at B-21.

13

WORKING DRAFT

development zoning from undevelopable land to prime building areas. The practical effect of this plan is to increase, not decrease, the amount of land that would be developed in the main Village Area.

At the East Parcel a stronger, but still weak, case can be made that there would be a net increase in Conservation Preserve and Forest Recreation zoning as a result of the project. There lots 44, 47, and 45 would be changed from Entrance Commercial to Conservation Preserve.[40] This land functions as a barrier between the proposed entrance commercial development of high density employee housing, a shipping and receiving center, and a convenience store[41] and the adjacent existing residential neighborhood. Given the strong objections and legitimate concerns about noise and other issues expressed by the members of this neighborhood to the proposal that includes this buffer,[42] it's hard to imagine that actual commercial development of this buffer land is viable either if one seeks any level of compatibility with adjacent uses.

G) Expansion of Transit and Transportation Management

i) The report details a lengthy list of actions intended to get people out of their cars and onto transit. This is all well and good, but most of what is detailed are simple "fair share" payments to regional systems. In addition to these bare minimum requirements, the project would include a "transit center" which is described in general terms as a "drop-off/pick-up facility with the capacity to accommodate two buses at a time" that would be "centrally located in the Village Core[43] and the payment of a one-time lump sum in the amount of $85,000 followed by annual payments of $97,500 towards capital expenses

[40] Specific Plan at pages 1-11 (showing existing zoning in plan area) and 3-3 (showing proposed zoning in plan area)

[41] Specific Plan at B-41 to B-48.

[42] Jeff Hekemian, for example wrote "My wife and myself live at 294 Indian Trail Rd in Olympic Valley. We are trying to raise our 3 young children here, fulltime. Our backyard is the "East Parcel" which is proposed to have the employee housing and new shipping and receiving. In 2014, we paid $30,209.84 in property taxes to Placer County. If KSL builds what they want on the East Parcel, it would destroy our property value, as well as everyone else's home value surrounding this parcel. Go check out Northstar's employee housing, would you want that in your backyard??? Northstar employee housing has been a complete disaster, I will not allow this in my backyard." FEIR at 3.2.5-408.

[43] DEIR at 9-35.

14

WORKING DRAFT

associated regional transit improvements.[44] Although the additional payments would be a lot of money for an individual, it's important to put them in perspective of the $1.75 billion in unmet needs for the 2016 Placer North Lake Tahoe Transit Vision.[45] Of that sum, assuming generously that they receive both automatic 5 year extensions to the 20 year development agreement, it's a mere .17%.[46] Similarly, it's important to keep in mind that despite these contributions, impacts to traffic were found to be significant and unavoidable in Squaw Valley and along Highway 89 from Tahoe City to Truckee. Basically, contributions to transit and other traffic management efforts are small, and they are definitely not enough to prevent this traffic from worsening gridlock in Squaw Valley or the Tahoe Truckee Region.

07-7 (cont.)

H) Vehicle Miles Traveled (VMT) in the Lake Tahoe Basin

i) The report reveals that the project would generate roughly 23,842 VMT in the Lake Tahoe basin and note that this amounts to a 1.2 percent increase to total basin VMT. It then states that total VMT in the Basin would still be under, but near to the maximum threshold allowed by TRPA thresholds. [47] It then proceeds to suggest, without any analysis, that speculative investments in transit would result in some reduction to this number.[48]

Again the report omits critically important information. Vehicle Miles Traveled in the Basin are, unfortunately a zero sum game. That means that available VMT consumed by the Village at Squaw Valley specific plan outside of the development necessarily displaces other development that would generate VMT. The end result is that approving this project would interfere with the goals of the Draft

[44] Staff Report at 31 to 33.
[45] North Lake Tahoe Region Transportation Update to TRPA June 6, 2016 slide 31 of 35, Jennifer Merchant Deputy Placer County Executive Officer. Available at: http://www.trpa.org/wp-content/uploads/Presentation-Agenda-Item-No.-VII.D-North-Lake-Tahoe-Regional-Transportation-Update-Placer.pdf.
[46] Calculated from assumed total annual payments of $2,925,000 (30x97,500) and a one time $85,000 payment detailed in the development agreement on page 67 of the Staff Report.
[47] Staff Report at 33.
[48] Id. at 34.

15

Placer County Tahoe Basin Area plan for actually needed redevelopment of town centers like Tahoe City and King's Beach.

Making matters worse is that an analysis performed by MRO Engineers concluded that trip generation from the Project is significantly underestimated,[49] and as a result, Basin VMT is as well.

The reason that any of is this important is similarly absent from the report's discussion of the issue—what's at stake is not just traffic delays, it's the clarity of the lake itself. As the League to Save Lake Tahoe explains, "When cars and trucks drive over the road traction abrasives that Tahoe agencies apply to provide safe winter traction for drivers, they crush materials into a fine dust — making them the single largest source of fine sediment."[50] In turn, that fine sediment is biggest reason that lake clarity is decreasing.[51]

IV) WATER SUPPLY ASSESSMENT

1) *Comments on Issues Addressed in the Report*

A) Purpose and Need

The report correctly notes that California Water Code requires that a project analyze water demands and needs over a 20 year period in 5 year increments. They then state that this WSA would do so for 25 years in order to at least analyze the project at full buildout in 2045. Although this might comply with bare minimum state law consider the lack of prudence of making a decision to add development on this scale while only studying whether water would be sufficient up until the day that construction stops without looking out over at least some portion of the useful life of the full project.

Furthermore, since the Development agreement, Appendix I to the report, now calls for a 20 year development period followed by two 5 year automatic renewals, the potential full buildout date is extended to 2046, six

[49] FEIR at 3.2.4-315 to 3.2.4-317.

[50] Opinion: New development projects key to restoring lake clarity, Tahoe Daily Tribune | Darcie Goodman Collins, PhD | Apr 9, 2016 available at: https://keeptahoeblue.org/news/tahoe-in-the-news/opinion-new-development-projects-key-to-restoring-lake-clarity.

[51] Id.

WORKING DRAFT

years after the end of the WSA's study period. Whether this is legal or not, it would be irresponsible.

B) Groundwater Basin Status and Description

The description in the report fails to disclose that the Olympic Valley Groundwater Basin exhibits hydrogeology that is perfectly consistent with a subterranean stream, rather than simple groundwater. This is important because subterranean streams are regulated by the State Water Resources Control Board, and should they assert their regulatory authority, the applicant would need to apply for water rights from the state. Any member of the public could make this request at any time and such a request would be increasingly likely should pumping proposed for irresponsible development threaten existing users and natural resources. Even if they were granted these water rights they would almost certainly be junior to existing users, making reliance upon them to serve significant new development ill-advised. For a more complete description of this issue see our comment letters on the project. [52]

C) Sufficiency of Supply

The WSA's sufficiency determination is based on a simulation of past precipitation, climate, and hydrology data and projected future demands. This ignores the broadly accepted conclusions of scientists that climate change will mean less snow, more rain, and dramatically altered hydrological regimes throughout the Sierra Nevada.[53] Furthermore, the modeling itself is based upon a set of highly unrealistic assumptions, including that water will be able to percolate to the aquifer through buildings and parking lots, and subterranean flow patterns and rates that are simply not observed in nature or fully disclosed in the modeling.[54]

V) CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

Sierra Watch recently submitted letter on the inadequacy of the Final Environmental Impact Report via our counsel Shute Mihaly and Weinberger. A repetition of that 90+ page letter is unnecessary here. Suffice it to say that we,

[52] Discussions of water rights and the subterranean stream are found in the Sierra Watch FEIR Comment Letter on page 15, FEIR at 3.2.4.-198 and the Sierra Watch DEIR Comment Letter on page 15.
[53] See Sierra Watch FEIR Comment Letter at 12 to 15.
[54] Id. at 16 to 19.

17

WORKING DRAFT

and the many other individuals, organizations, and state agencies who have provided comments strongly disagree with staff's assertion.

Of particular note is the recent letter from the California Attorney General affirming and elaborating on inadequacies in CEQA process that we also believe fail to protect Lake Tahoe and conflict with statewide efforts to combat climate change.

07-9 (cont.)

VI) RECOMMENDATION

As discussed herein and in other comments we have provided to Commission, the public benefits cited by staff in this report are minimal or illusory, the environmental impacts would be far greater than disclosed by the Final Environmental Impact Report, and alternatives that would create far fewer environmental impacts were improperly rejected and ignored. For all of these reasons County approval of the plan would be irresponsible and illegal. We urge the commission to recommend that the Board of Supervisors deny the project as proposed.

18

07

Sierra Watch
Isaac Silverman, Staff Attorney
August 10, 2016

07-1 This introductory comment summarizes the opposition to the project and disagreement with the recommendation in the staff report. However, the comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

07-2 The comment states that the Planning Commission staff report included a misleading or incomplete project description because the staff report stated that approval of the specific plan and related entitlements would enable build out of the plan area in accordance with specific plan zoning and policies over the anticipated 20-25 year project build out period, but that the report gave a misleading impression about plan area implementation because the staff report also stated that no project level entitlements are requested to be approved concurrent with the specific plan. The comment goes on to state that if the specific plan is approved future discretionary actions by the County for project entitlements, such as Small Lot Tentative Maps, would have to be approved if they conform to the development standards and policies of the specific plan.

Nothing in the Planning Commission staff report is incomplete, ambiguous, or misleading about the effect of project approval. The very purpose of a specific plan is to provide a detailed policy and code framework for implementation of land uses within the defined geographic area of the specific plan boundaries, consistent with State planning law. In this particular instance, the specific plan area applies to a relatively small geographic area. Accordingly, the specific plan includes a greater level of detail and certainty to the location of buildings and infrastructure improvements, land uses and the developed character of land uses than is typical for a program level planning document and thereby provides greater certainty to the resultant land uses. Nothing in the report sought to hide this fact. Instead, the report sought to highlight this issue to provide decision-makers greater certainty when judging the merits of the project.

07-3 The commenter states that the staff report presents an incomplete and inaccurate description of the project's compliance with the Placer County General Plan and the Squaw Valley General Plan. The comment goes on to list and describe policies of the Placer County General Plan and the Squaw Valley General Plan that the commenter believes the project would be inconsistent with, as follows:

> Placer County General Plan Policy 3.A.7: The County shall develop and manage its roadway system to maintain the following minimum levels of service (LOS), or as otherwise specified in a community or specific plan).
>
> a. LOS "C" on rural roadways, except within one-half mile of state highways where the standard shall be LOS "D."
>
> b. LOS "C" on urban/suburban roadways except within one-half mile of state highways where the standard shall be LOS "D".
>
> c. An LOS no worse than specified in the Placer County Congestion Management Program (CMP) for the state highway system.

Temporary slippage in LOS C may be acceptable at specific locations until adequate funding has been collected for the construction of programmed improvements.

The County may allow exceptions to the level of service standards where it finds that the improvements or other measures required to achieve the LOS standards are unacceptable based on established criteria. In allowing any exception to the standards, the County shall consider the following factors:

- The number of hours per day that the intersection or roadway segment would operate at conditions worse than the standard.
- The ability of the required improvement to significantly reduce peak hour delay and improve traffic operations.
- The right-of-way needs and the physical impacts on surrounding properties.
- The visual aesthetics of the required improvement and its impact on community identity and character.
- Environmental impacts including air quality and noise impacts.
- Construction and right-of-way acquisition costs.
- The impacts on general safety.
- The impacts of the required construction phasing and traffic maintenance.
- The impacts on quality of life as perceived by residents.
- Consideration of other environmental, social, or economic factors on which the County may base findings to allow an exceedance of the standards.

Exceptions to the standards will only be allowed after all feasible measures and options are explored, including alternative forms of transportation.

Analysis of consistency with this policy is described and analyzed in DEIR on pages 4-23 to 4-24, 9-28 to 9-29, and as Specific Plan Policy CP-1 (which builds from General Plan Policy 3.A.7) on DEIR pages 9-33 and 9-57 through 9-59. A short discussion is also included on pages 55 and 56 of the August 11, 2016 staff report to the Planning Commission.

In the instance of this project, it was determined that after application of all feasible mitigation measures, the LOS failure of one intersection within the plan area (Squaw Valley Road and Village East Road) would be acceptable because the failure would occur on an infrequent basis of approximately 20 times per year during peak ski days and normal traffic operations would occur on most days throughout the year.

The comment goes on to state that approval of this policy would remove an obstacle to growth and that the EIR should be revised to evaluate the ways in which removing this obstacle would increase environmental impacts. No such additional impacts would occur because Policy CP-1 would only apply to projects within the specific plan, and all specific plan land use impacts were analyzed in the EIR.

Placer County General Plan Policy 3.A.8: The County shall work with neighboring jurisdictions to provide acceptable and compatible levels of service and joint funding

on the roadways that may occur on the circulation network in the Cities and the unincorporated area.

The commenter states that the EIR provides no evidence that the County or the applicant has made any attempt to work with local jurisdictions to provide acceptable levels of service and asserts that the project would result in significant impacts in contravention of Policy 3.A.8.

The commenter provides no evidence for this unfounded assertion. Throughout the review of this project, County staff and the County's traffic consultant have had numerous written correspondences and meetings with Town of Truckee staff, TRPA staff, and Caltrans staff. Furthermore, in 2007 Placer County and the Town of Truckee approved a Cross Jurisdictional Impact Fee Agreement. Please see response to comment O6-40 in this document.

> Placer County General Plan Policy 1.G.1: The County will support the expansion of existing winter ski and snow play areas and development of new areas where circulation and transportation system capacity can accommodate such expansions or new uses and where environmental impacts can be adequately mitigated.

The commenter states that the project is inconsistent with Policy 1.G.1. Please see response to comment O4-12 in this document.

SVGPLUO Peak Overnight Population

The Squaw Valley General Plan states that the plan "allows for growth in Squaw Valley to reach a seasonal-peak, overnight residential population of about 11-12,000" (page 5, SVGPLUO). The commenter asserts that the peak overnight projection prepared by County staff, which estimates that the existing plus project population would be 9,483 persons, is fatally flawed because the projection relied upon U.S. Census data to project how many persons would be residing or staying in each single-family home. For a detailed description of how the estimate was computed, please see response to comment PH-20 on page 3.2.6-81 of the FEIR.

An environmental analysis must include substantial evidence to support its conclusions and while some degree of forecasting is necessary in predicting outcomes a lead agency should use reasonable efforts limit speculation (see CEQA Sections 15144 through 15148). The U.S. Census is the only known source of data for how many persons would be staying in each single-family or multi-family private residence. Olympic Valley has a relatively high percentage of private residences used as second homes and vacation homes (approximately 50 percent), and data for these units is not collected in the U.S Census. Accordingly, no specific data exists to determine the precise period(s) of use or occupancy of these units. In absence of more specific information, the County determined nonetheless that these units were likely to be in use during peak occupancy periods and that it was reasonable to assume that these units would have comparable occupancies to primary residential units detailed in the U.S. Census.

O7-4 The commenter asserts that the project would be inconsistent with the objectives of the SVGPLUO to "establish a planning framework to ensure that Squaw Valley is developed into a top quality, year-round, destination resort….without adversely impacting the unique aesthetic and environmental assets of Squaw Valley" and that the August 11, 2016 staff report to the Planning Commission failed to consider the environmental impacts of the project when analyzing the project's consistency with this policy framework.

As stated on page 25 of the staff report:

Policies further describe a development vision for the Resort base that balances the quality and quantity of development in order to protect, conserve and enhance the environmental assets of the Valley based on sound social, economic, and environmental practices while facilitating further development of the resort base and surrounding community. The SVGPLUO encourages intensive development to occur within already disturbed areas near the resort base, and for development of undisturbed areas to be implemented in a manner that balances development of new resort lodging and commercial uses with conservation of resources. The SVGPLUO further recognizes the existence of traffic problems resulting from winter season traffic peaks associated with weekend day-skier visitation coupled with the limited off-season resort usage, which results in periods of heavy resort attendance during peak usage periods followed by limited attendance during other times of the year. Plan policies and land use designations establish a framework to attract more people during spring, summer, and fall in order to enhance commercial lodging and recreation-related industries.

In order to achieve these objectives, the SVGPLUO established a core village area at the west end of the Valley to promote development of an urban resort village that would serve as the focal point of lodging and resort activity in the Valley helping to "draw year-round visitors and enhance the economic base of the community" and "reduce the need for day-skier parking in the core area by, in part, replacing the day-skiers with overnight or week long visitors" (SVGPLUO, page 6). The primary land use in this portion of the SVGPLUO plan area is the Village Commercial land use district. The intent of the Village Commercial land use district is to encourage new cultural and recreational facilities as well as hotel, restaurant, commercial, and office uses. The Village Commercial land use district comprises the majority of this portion of the Specific Plan including portions of the plan area proposed for development. The SVGPLUO further recognizes that development of this area would not be possible without development of structured parking facilities. Accordingly, projects that develop structured parking are permitted a corresponding density increase in recognition of this critical aspect of resort base redevelopment.

The SVGPLUO states that adding to the resort base would increase the feasibility of establishment of a transit center to act as a transportation hub for non-resident day-skiers and resort guests travelling from other regional locations within the Tahoe Basin, Truckee and surrounding areas thereby helping to reduce day-skier parking demand and aiding in the reduction of local and regional traffic congestion. If the specific plan is approved it would construct up to 1,493 bedrooms of development plus employee housing, or slightly more than 50 percent of the 3,085 bedrooms of development that could potentially be allowed within the plan area under the SVGPLUO. This substantial reduction in the plan area holding capacity would ensure that SVGPLUO policies pertaining to balancing the quality and quantity of development to protect, conserve and enhance the environmental assets of the Valley while facilitating further development of the resort base and surrounding community would be met. Furthermore, this reduction in holding capacity along with the substantial detail contained within the plan to determine where and how development would occur is intended to ensure that plan area development would be compatible with and complimentary to existing land uses surrounding the Project, which consist predominantly of other commercial, guest lodging and multi-family residential uses near the Main Village, and commercial and residential uses adjacent to the East Parcel.

Moreover, the commenter's general assertion is that the benefits of the project do not outweigh its environmental impacts. For the County's analysis of this issue, please refer to

the County's detailed CEQA Findings of Fact attached to the Board staff report, which determined that the project benefits would outweigh the impacts.

Stream Restoration

The commenter asserts that the widened and restored Squaw Creek Trapezoidal Channel would be flanked by 35-foot-tall parking garages and that this information is not described in the staff report. The commenter further asserts that while restoration of the Trapezoidal Channel and Olympic Channel would have some merit, money is already being raised to restore these portions of the creek and that restoration would occur with or without the project.

In addition to a detailed written description of the type and location of parking facilities, the Planning Commission staff report also included select graphics from the specific plan to reinforce the written description of the project. Labelled graphics showing the parking structures in plan view as well as computer simulated renderings are provided in two locations in the staff report. Furthermore, the commenter mischaracterizes the height of the parking structures in the main Village which would have parking decks that would be a maximum of 20 feet tall plus 42 inches of safety rail/cladding, and architectural elements at corners that could extend to a maximum overall height of 30 feet. Moreover, these elements were described to the Planning Commission in County staff's oral presentation of the project.

With regard to the commenter's assertion that stream restoration will occur with or without the project, this may be true. However, restoration would be substantially less comprehensive and may not include the Trapezoidal Channel or the Olympic Channel, both of which are located on private property and would require the consent of the property owner to construct and monitor restored steam sections. More to the point, the comprehensive stream restoration project proposed by the project requires substantial redevelopment and relocation of existing resort land uses and facilities. For example, to complete widening of the Trapezoidal Channel by 50 to 100 feet, hundreds of parking spaces have to removed, relocated and reconstructed in a new location. Structured parking facilities are one of the means the project would use to achieve this aspect of the restoration plan. To restore the Olympic Channel an existing storm water drainage culvert that runs under the existing ski resort parking lots must be removed or abandoned, as this is the current drainage path of the Olympic Channel, and the Olympic Channel must be reconstructed as a surface water feature. The location where the Olympic Channel will be restored currently includes volumetric snow storage for the resort and the replacement location for this snow storage is the volumetric snow storage bunkers that would be constructed adjacent to each of the structured parking facilities. It should be noted that these volumetric snow storage facilities would include storm water infiltration systems that would recharge the aquifer and may have the co-benefit of providing additional support to dry-season surface water flows in the adjacent Trapezoidal Channel of Squaw Creek. Furthermore, the Olympic Channel location includes an existing wetland that must be impacted in order to construct the Olympic Channel improvements, which include creation of a substantial amount of new wetlands, which may have the co-benefit of providing additional groundwater recharge.

The planning, permitting, and facilities relocation needs and costs for this level of restoration effort is likely to be, in the opinion of County staff, beyond the ability of a non-profit group or other community group to achieve due to the complexity of the permit process. Equally if not more important is the CEQA clearance, discretionary permitting, and development costs to relocate existing resort facilities to achieve these ends. While it may be possible that the Resort operator would be willing to voluntarily absorb these substantial costs in absence of a project, it seems unlikely.

07-5 The commenter provides a number of opinions on the merits of various components of the project. These are described and responded to below.

Park and Recreation Improvements

The commenter lists several of the park and recreation improvements, including enhancements to existing hiking trails located on lands owned by the U.S. Forest Service and the Resort, and goes on to express an opinion of the U.S. Forest Service's likeliness to approve enhancements to existing trails, construction of one new trail segment, and the public value of these recreation improvements. The commenter further expresses an opinion that, based on comments from the U.S. Forest Service in response to the DEIR, the U.S. Forest Service does not support the trail network enhancements detailed in the final Park and Recreation Plan.

While the U.S. Forest Service did provide comments on the cited issues in response to the DEIR, the applicant and County staff have worked with the U.S. Forest Service to address each of these issues to their satisfaction. Notably, the U.S. Forest Service staff spoke at the Planning Commission hearing on the project entitlements and FEIR and stated to the Commission that all of their issues had been satisfactorily addressed through ongoing coordination with County staff and the applicant, and in the responses to the FEIR. In response to the commenter's opinion that the "'significant enhancements' to the trail network are repairs to existing trails that are already functioning quite well", in its communications with County staff and the applicant, the U.S. Forest Service has indicated that the trails that would be enhanced and reconstructed by the project are degraded, are not developed to the U.S. Forest Service's current standards, and that their improvement is desirable for purposes of enhancing public recreation value and reducing impacts to the current system such as erosion and storm water quality.

Employee Housing

The commenter correctly restates elements of the project's Employee Housing Plan and "over and above" commitments for additional funding to the County to improve its stock of employee housing in the Eastern portion of the County where the project is located. The commenter goes on to state that the project would exacerbate "the well documented affordable housing crisis in the Tahoe-Truckee area", and then quotes statistics from a housing study pertaining to housing costs in the region. The commenter also states the opinion that the project commitments to provide workforce housing are inadequate because workforce housing would only be provided for 50 percent of the project generated 574 full-time equivalent employees and would not provide housing for all 751 full-time and part-time employees generated by the project.

As described in the staff report to the Planning Commission, the project would develop employee housing for up to 201 new resort employees plus replacement housing for 99 existing employee units (with a maximum of up to 300 employees including some replacement employee housing). The remainder of employee housing would be fulfilled by construction of off-site employee housing, dedication of land needed for units, payment of an in-lieu fee, or any combination thereof in accordance with General Plan Policy C-2 and employee housing policies contained in Specific Plan Section 3.5 (Employee Housing). In addition to these commitments, the project would also contribute $500,000 to the County for development of workforce housing in the greater Lake Tahoe region. Accordingly, the project would comply with Placer County General Plan policies pertaining to provision of workforce housing in the Eastern portion of the County and would contribute additional funding to the County for provision of additional housing. The Board of Supervisors will consider the merits of the project's Employee Housing Plan and its contributions toward resolving the region's shortage of workforce housing options when rendering a decision on this project.

Structured Parking

The commenter states that the staff report includes a detailed description of how the project parking would conform to the Squaw Valley General Plan parking requirement to provide 3,100 day skier parking spaces, but questions if the project would provide adequate parking to accommodate existing uses and project uses. The comment goes on to state that the required 3,100 day skier parking spaces would be inadequate because the County's analysis determined that there would be inadequate day skier parking on the four busiest ski days of each season. The commenter further states that on a peak ski day the existing parking lots are managed to enable parking of as many as 5,000 vehicles.

As described in the staff report to the Planning Commission, the Parking Master Plan anticipates that project build out would require development of 5,110 total parking spaces to serve resort guests, employees, and the fifth highest day skier parking demand of 3,100 spaces, which is representative of the peak average day skier peak parking demand. Of those 5,110 parking spaces, the project would result in an estimated demand for approximately 2,010 parking spaces to serve resort guests, new commercial and retail land uses, and new project generated employees.

Three thousand one hundred (3,100) improved day skier parking spaces would be maintained throughout all phases of the project. To provide additional flexibility and parking capacity, surface parking and structured parking spaces are proposed to be managed flexibly through implementation of attendant assisted parking on peak ski days to increase the actual number of vehicles parked, as is currently done. This level of parking is consistent with the requirements and policy structure of the SVGPLUO, which anticipates that as the resort base is developed with additional guest lodging services a substitution effect will occur and a portion of the current day skier population would become resort lodging guests, thereby fulfilling the SVGPLUO vision for development of a destination resort.

The County's analysis of project-generated traffic impacts was conservative and did not account for this substitution effect. However, there is anecdotal evidence that supports the assumption that as more lodging is constructed a larger portion of the resort skier population will be drawn from this lodging pool and there will be fewer day skiers (because a portion of the day skiers will become lodgers). The commenter does not raise any specific issues that have not already been examined but rather contends that a portion of the existing resort users are being "kicked out" because the analysis determined that there could be as many as four peak ski days per year when the resort parking would not accommodate total day skier parking demand, and therefore some skiers would not be able to find parking at the resort. Both the specific plan and the EIR acknowledge this potential and the specific plan includes provisions for identification of future off-site parking facilities serviced by a private resort operated shuttle. Because the project is a specific plan and will be implemented in several phases over a long period of time these issues will be analyzed concurrent with each phase of development as the project builds out (see Parking Master Plan detailed in Section 8.3.1 of the Specific Plan). While plan implementation would not require development of off-site parking facilities to provide additional day skier parking beyond 3,100 spaces, the project contemplates that provision of additional off-site day skier parking may be desirable.

07-6 The commenter states that the staff report discusses the project's compatibility with adjacent land uses and the commenter seems to agree with the analysis of compatibility between the existing and proposed land use types, but disagrees that the analysis is correct because the commenter asserts that the intensity of proposed land uses makes the project incompatible. The commenter goes on to assert that the project increase in Conservation Preserve and Forest Recreation land uses is illusory because, in the commenter's view, the areas that are being rezoned are not suitable for development for a variety of stated reasons. The commenter then goes on to point out that some lands that are being zoned for

development (from Conservation Preserve and Forest Recreation) are level and free of sensitive habitats and that the effect is to increase the amount of land that could be developed. The commenter also states that the portions of the East Parcel that would be rezoned from Entrance Commercial and High-Density Residential land uses to Conservation Preserve is insufficient to buffer the East Parcel land uses from adjacent single-family residential land uses.

Under the SVGPLUO, the plan area includes over 73 acres of lands that support development of commercial and resort residential land uses at an average density of slightly less than 42 bedrooms per acre, or stated otherwise 3,085 total bedrooms, not including any density bonus for structured parking, plus resort serving commercial land uses. By contrast, the project would develop and redevelop a total of 1,493 total lodging bedrooms plus resort serving commercial land uses on approximately 39 acres, or slightly more than 38 bedrooms per acre on average. Per policies of the SVGPLUO, employee units are not considered in the density calculation. However, if employee units are considered it would raise the average density to 42 bedrooms per acre, consistent with the existing land use designations.

Under the project, lodging development would occur within a substantially smaller area, 39 acres compared to a potential 73 acres, and at an overall 50 percent reduction in density on a plan area wide basis. This density is compatible with existing lodging land uses that surround the project and are developed at similar average densities. In addition, those existing lodging land uses are not burdened with the same requirements to provide parking or other facilities, such as day-skier parking, to support resort operations.

In response to the commenter's assertion that some flatter and already developed areas would be rezoned to permit development while areas that have resource and topography constraints would be rezoned to Conservation Preserve and Forest Recreation, the County agrees that this is the case and would highlight that this is a desirable result of good planning. The fact that this is being done because these areas are less suitable for development (and other areas are more suitable) does not negate the benefits of restricting the land use to prevent future development potential.

In response to the claim that the buffering mechanisms on the East Parcel, which include rezoning lands adjoining residential land uses to Conservation Preserve, incorporating a minimum 100-foot wide landscape buffer, orienting site land uses away from adjacent residences and buffering them with dead-wall buildings (i.e., no windows or doors facing residences) and incorporating a privacy screening wall to buffer the parking structure, the County disagrees that this is inadequate buffering.

07-7 See the Master Response regarding project-generated VMT in the Tahoe Basin in this document and response S1-7 concerning transit.

07-8 Responses to the commenter's critiques of the WSA are provided in the Master Response regarding water supply in the FEIR (pages 3-2 through 3-18). In summary, the WSA projects water use through anticipated buildout of the specific plan and the analysis of future water supplies considers the effects of climate change. While insufficient detail exists on climate change to simulate in the numerical model, climate change was considered and relevant information regarding predictions for future climate change and the relationship between precipitation in the watershed and groundwater recharge in Section 7 of both the 2014 WSA and the 2015 WSA update. The WSA considers and references available studies that have quantified changes in future precipitation in the Sierra Nevada Mountains and the Tahoe Basin. The analysis in the WSA concludes that even the most conservative estimates of annual runoff reduction have a limited effect on the availability of potential recharge to the Basin.

With respect to the potential for the aquifer to be considered a subterranean stream subject to water rights, see response to comment 08a-70 in the FEIR (page 3.2.4-248). DWR has designated the Olympic Valley Groundwater Basin as a groundwater basin (Number 6-108) in accordance with Bulletin No. 118 (DWR 2003). The official DWR groundwater basin description cites no mention of subterranean streams in the Olympic Valley Groundwater Basin, nor does it characterize the basin as under the sole influence of the creek.

07-9 The comment recommends denial of the project. However, the comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

08

truckee north tahoe tma

April 18, 2016

Mr. Alex Fisch, Project Planner
Ms. Maywan Krach, Environmental Coordination Services
Community Resources Development Agency
3091 County Center Drive
Auburn, CA 95603

Re: Comments on the "Final Environmental Impact Report (FEIR) Village at Squaw Valley Specific Plan

Dear Mr. Fisch and Ms. Krach:

Staff at the Truckee North Tahoe Transportation Management Association (TNT/TMA) has reviewed the FEIR response to our Draft EIR comment letter dated July 16, 2015.

The FEIR identifies our comment as 013-1 and, in response, proposes **Mitigation Measure 9-7b: Maintain Membership in the Truckee North Tahoe Transportation Management Association (TNT/TMA).** The text of this measure is written as follows:
The following mitigation measure, while not required to achieve or maintain a less-than-significant impact conclusion, would further reduce the project's impacts to transit.

08-1

Prior to approval of improvement plans/final maps, the project applicant shall maintain membership in perpetuity in the Truckee North Tahoe Transportation Management Association (TNT/TMA). Once commercial and homeowners groups have been formed, the project applicant shall shift the TNT/TMA membership to the associations and the associations shall maintain membership in perpetuity. It is not anticipated that membership will need to be cancelled; however, if for a reason unknown at this time cancellation of membership is required, it shall be mutually agreed to by the County and the entity responsible for paying the annual dues.

In reviewing the FEIR section (2) entitled: **Project Modifications, Updated Water Supply and Groundwater Data, and Revisions to the DEIR**, we see that the title and text of Mitigation Measure 9-7 in Table 2-2, "Summary of Impact of Mitigation Measures" has been revised by the County Department of Public Works to read:

Mitigation Measure 9-7a: Contribute fair share or create a Community Service Area (CSA) or a Community Facilities District (CFD) to cover increased transit service.
The project applicant shall commit to providing fair share funding to the Department of Public Works and Facilities (DPW&F) or create a Community Service Area (CSA) or a Community

Facilities District (CFD) to fund the costs of increased transit services. An Engineers Report shall be complete prior to recordation of any Small Lot Final Map to the satisfaction of DPW&F to define the fair share or used for the creation of the CSA or CFD. If and when a CSA or CFD is formed, the project applicant shall no longer be responsible for making fair share payments to DPW&F for the increased transit service for the portion of the project covered by the CSA or CFD.

This mitigation measure meets the intent of Specific Plan Policies CP-2 through CP-4, and clarifies how the project would contribute to enhanced transit operations. Increased service may consist of more frequent headways, longer hours of operations, and/or different routes. The fee calculations shall consider both capital expenses and on-going operations and maintenance expenses.

Request for Clarification
The TNT/TMA appreciates the proposed mitigation measures as responsive to our July 16, 2015 comment letter. We respectfully request that the Final EIR, as revised, should include at least a summary explanation of the process for creating a CSA or CSD, as identified in Mitigation Measure 9-7a and the anticipated boundary associated with the CSA or CSD.

Thank you in advance for responding to this request.

Sincerely,

Jaime Wright
Executive Director
Truckee North Tahoe Transportation Management Association

08

Truckee North Tahoe Transportation Management Association
Jaime Wright, Executive Director
April 18, 2016

08-1 See response to comment S1-7 in this document regarding traffic Mitigation Measures 9-7a and 9-7b, including information related to funding requirements for enhanced transit service.

The commenter requests a brief description of the process for the formation of a Community Facilities District (CFD).

The Community Facilities Act, which is more commonly known as the Mello-Roos Act of 1982 (California Government Code Section 25210.1 et. Seq.), enables the formation of a Community Facilities District (which may also be referred to as a County Service Area [CSA]). A CSA is a geographic area where a special property tax on real estate is imposed on taxable real property within the CSA in order to provide a traditional revenue stream for expanded service levels for any governmental services and facility that the County is authorized to perform and that the County does not perform to the same extent on a countywide basis. A CSA and associated zone(s) of benefit may be established by the County in cooperation with a group of property owners or developers following a 2/3rds vote to approve the assessment of the tax, proportionate to the fair share funding obligation of the property in relation to the services and facilities provided.

In the instance of the VSVSP project, formation of and participation in the transit CSA/CFD would be a condition of approval on any Small-Lot Final Map, applied in accordance with Mitigation Measure 9-7a. The “vote” of the property owner to voluntarily annex into the CSA/CFD would be a conditional requirement prior to recordation of a Final Map, and the vote of the property owner would therefore constitute a 100 percent voter approval. After recordation of the Final Map and subsequent sale of individual lots or units, each subsequent owner would automatically be subject to the special tax.

A CSA is authorized to provide funding for a wide variety of services and facilities, including but not limited to:

1. transportation and transit services;
2. law enforcement and police protection;
3. fire protection, fire suppression, vegetation management, search and rescue, hazardous material emergency response, and ambulances;
4. recreation, including but not limited to parks, parkways, and open space;
5. libraries;
6. the collection, treatment, or disposal of sewage, wastewater, recycled water, and storm water;
7. acquisition, construction, improvement, and maintenance, including, but not limited to, street sweeping and snow removal, of public streets, roads, bridges, highways, rights-of-way, easements, and any incidental works; and

8. acquisition, construction, improvement, maintenance, and operation of street lighting and landscaping on public property, rights-of-way and easements.

09

Friends of Squaw Valley
PO Box 2823
Olympic Valley, CA 96146
friendsofsv@gmail.com

June 9, 2016

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, #190
Auburn, CA 95603

Via email: cdraecs@placer.ca.gov

Re: Village at Squaw Valley Final Environmental Impact Report (FEIR)

To Whom It May Concern:

Thank you for the opportunity to respond to the Village at Squaw Valley Final Environmental Impact Report (FEIR).

09-1 (cont.)

While the Draft EIR (DEIR) and FEIR project numerous significant impacts of the project, the FEIR does not adequately respond to our comments on the DEIR. In particular, a revised project size and design to adequately and most effectively reduce impacts below the significant level has not been presented.

It is disappointing that the FEIR only reduced three (of the 23) significant and unavoidable impacts resulting from the SVRE's proposal. Serious environmental concerns remain regarding noise, scenic views, water supply, population, loss of night sky, and greenhouse gases. The only way to lessen these impacts is by reducing the number of bedrooms and resulting population increase which requires adoption of a project Reduced Density alternative or denial of the project.

The FEIR acknowledges a "potentially feasible" solution with the Reduced Density Alternative (17.3.4) that poses a reduction to 50% of the bedrooms in order to avoid or substantially reduce the significant environmental impacts. However, the FEIR did not respond with analysis of two additional alternatives that FOSV recommended for review: a revised Reduced Density Alternative (50%) to also include design features which would better address significant avoidable and unavoidable impacts. In addition, a second reduced scale alternative to 400 rooms was recommended to further test the appropriate room number against critical impacts and to provide a greater range of alternatives. The FEIR responses were generally dismissive of the effectiveness of the FOSV proposed pragmatic design features as well the option of discussing a 400 room alternative.

We continue to request an inclusion of our recommended additional design features as either part of additional project alternatives or as mitigation measures. The FEIR responses did not adequately explain why the FOSV

1

recommended design features would not provide additional mitigation beyond what was proposed in the DEIR. At a minimum, there is certainly nothing wrong with providing the additional evaluation of ideas that have been an integral part of the public discussion and which would all provide mitigation beyond what is recommended in the DEIR.

Of particular importance are the following alternative design features we recommended in the DEIR as well as key impact issues that have still not been adequately addressed:

1. Reduce building height to 70 feet to reduce significant visual impacts. We requested this feature to be part of a revision of the Reduced Density Alternative (Comment 2-84). We commented in depth in our DEIR comments (pages 15-24) on the project's potential visual impacts including height of buildings. The FEIR's response to eliminating reduced heights from the alternative discussion is brief and does not adequately respond to the many height related impacts we pointed out in our DEIR comments.

2. Eliminate MAC to reduce unavoidable significant visual impacts and land use policy conflicts. We recommended elimination of the 108 foot 90,000 sq. ft. MAC building in our DEIR Alternative comments (Comment 2-85).

   The FEIR response refers to a SVGPLUO policy that encourages tourist residential and commercial uses in the same structure as a reason to dismiss the FOSV idea of scattering recreational uses within the Village. This policy can also be read to encourage mixed use which our proposal for scattering recreational uses throughout the Village does in a manner more appropriate to a traditional Village in this mountain setting.

   The FEIR also responds to our proposal on the MAC that it would not meet the project sponsor's objectives of providing a world class facility and uses a comment from the developer to back up this conclusion (Hosea, last paragraph FEIR Master Responses, page 3-75, last paragraph). This discussion does not adequately describe why a reduced scale or scattering of recreational uses cannot specifically achieve the same project purpose of providing a "comprehensive apres ski experience" or "provide more year round opportunities".

3. Traffic

   a. Traffic volumes are still underestimated based on actual peak average winter ski conditions. (Our comment 2-27.) An accurate traffic analysis is needed to determine the appropriate project down sizing. As described in detail in a separate comment on the FEIR from our member David Stepner, the winter of 2011-12 used in the DEIR was significantly below average, with records showing almost no snow through the Christmas/New Year and MLK holidays. Because the peak traffic was low during those periods, all related impacts (such as noise and pollution) were therefore underestimated. The FEIR dismissed this argument, contending that since a significant amount of snow fell in the 2011-12 winter AFTER Presidents' Weekend, the skier, and therefore auto, traffic was representative. A careful reading of the FEIR response shows that even the authors did not believe this. They wrote "The comment is valid in that during a "good season" in which significant snowfall occurs in December and January, many of the busier days of the season occur during these months." The winter just passed, 2015-16, clearly showed that in an average winter, the heaviest days are during Christmas and the Jan-Feb holiday weekends.

2

b. Reduction of acceptable traffic standard to LOS F still not appropriate. The FEIR response to our comment 2-23 regarding lowering the LOS standard to F on part of the impact area roads is not responded to directly in the FEIR related to either the direct or indirect impacts we referred to.

c. Traffic mitigation still passed on to further study. Significant traffic impacts to Squaw Valley Rd. between Squaw Creek Rd. and the Village area discussed in our comment 2-24 are still not mitigated in the FEIR. The one paragraph response (FEIR page 3-28) continuing to rely on a future model for a traffic management on Squaw Valley Rd. still passes mitigation on to further study. It has still not been demonstrated that the triple lane arrangement will reduce impacts below the significant level which again points to the need for a reduced bedroom count alternative as the solution. The developer and the EIR consultants must be creative on how to address this issue NOW beyond the reliance on triple coning. The DEIR comment letters offered many possible solutions but all were dismissed. Some were simple (three, not two, "crosswalk facilities" should be completed along Squaw Valley Rd), some were harder (have signs alerting people on traffic conditions before entering Highway 89), and some (and most needed) were dismissed as impossible (triple lane Highway 89 for a dedicated bus lane).

07-3 (cont.)

4. Better Mass Transit Plan to reduce traffic impacts. A better mass transit plan was recommended in our DEIR comments. However, the FEIR transit discussion still does not vigorously explore creative mitigation. Responses to FOSV comments 2-29 through 2-32 related to alternative traffic reduction methods and transit service still dismiss additional measures that we suggested. Given the fact that the FEIR concludes that there will be three significant and unavoidable project traffic impacts and two unavoidable cumulative traffic impacts, greater attention to alternative forms of mitigation should still be attempted. As one response to our comments, it was concluded in the FEIR that increased transit options have not proven to be effective in the area in the past. We do not find this to be an adequate response. Because traffic impacts are already significant, at a minimum, the new shuttle system should be started during the next ski season rather than after the 150th bedroom is recorded. Though the developer has committed verbally to this, it should be recorded in a mitigation measure and condition of approval.

07-3

5. Confirmation of Adequate Water Supply. Hydrologists and others question the accuracy of the Water Supply Assessment (WSA). The FEIR states that the ongoing California drought "may produce a more severe multiple year drought than any within the available historical dataset or model study period". Although the last 3 years of drought were incorporated into the updated WSA, uncertainty of climate change and more extreme drought conditions were not analyzed. The FEIR does not provide the verification of water availability, only assessment calculations by computer modeling. Environmental impacts due to groundwater drawdown were not analyzed in any meaningful manner. Some monitoring of riparian vegetation and well operations has been added but there is no commitment to scale back or stop if adverse impact occurs or performance metrics are not met. There remains no commitment to an oversight committee to monitor for adverse impact. We have made detailed recommendations on this issue in the FOSV position paper expanding on the idea of a Water Management Action Plan and oversite committee. Without this type of mitigation, potentially significant impacts to water supply will remain unmitigated.

07-4

Placer County must appoint an appropriate agency for insuring the adequacy of the water supply. This monitoring program should be established before any project permits are issued, define quantitative measures of "adequate", and include (i) stop action criteria if adverse thresholds appear, (ii) verification of

3

09-4 (cont.)

adequate supply as a prerequisite to each new project, and (iii) criteria for responding to impacts on aquifer drawdown as well as on the creek and riparian environment. While the FEIR expands on proposed monitoring, it does not commit to an actual water management action plan with "stop development" action thresholds or a prearranged consequence of adverse impacts. Moving the fractional cabins out of the groundwater recharge area still deserves analysis also.

09-5

6. First entitlements to end at Phase I in 10 years. FOSV continues to recommend approval of only a Phase 1 project and that a balance of land uses occur in any phase. FoSV believes that a 25 year buildout is too long because unforeseen changes may occur. The FEIR response 2-86 that a 10 year entitlement only "would not be consistent with approval of the VSVSP as a single project" is true, but is not an adequate response. Certainly the project could be denied and reviewed again as a smaller project. Further phases could be part of discussions in a General Plan Update or placed in a holding zone designation.

However further phases are handled from a regulatory standpoint, additional entitlements should be granted only after an independent and comprehensive analysis is done that includes review of actual environmental impacts that have occurred compared to those projected in the Final EIR, as well as performance metrics in occupancy, economic impacts on the greater North Tahoe community, changes to climate, and economic trends in the ski, leisure and recreational industries.

We agree that the 12-13 year project buildout estimate for the 50% Reduced Density Alternative or a different Reduced Density Alternative would also meet the goal of a reduced length entitlement.

7. Move maintenance yard/preserve Shirley Canyon. Because LOT 19 proposes heavy maintenance operations at the mouth of Shirley Canyon and at the edge of Squaw Creek, a zoning change from Conservation Preserve and Forest Recreation to Village - Heavy Commercial is required. Potential spills of propane or vehicle maintenance fluids (diesel, oil, cleansers) pose substantial risk to Squaw Creek. The transit of numerous propane trucks to and from this location could create a potential disaster for the entire valley. The developer now also plans additional subsurface propane tank placement at Lot 28, even closer to the creek.

The FEIR response to our comments on this issue (2-90 and Master Response 3.1.14) is not adequate. In particular, the comment that "CEQA does not require that every permutation be evaluated in the DEIR" (Response to Comment 2-90) misses the point that this is a serious potential impact resulting from a major change in a combination of land uses to be permitted. The cumulative impacts of the variety of industrial use impacts combined which could result have been ignored by discussing each separately (visual, land use, propane storage, release of hazardous materials, etc.)

8. Full Squaw Creek restoration in initial construction phase. The developer has submitted a plan to significantly improve the current condition of Squaw Creek. Rehabilitation of the creek will improve its natural function and will enhances the natural beauty of the area. While the Master Phasing Plan (MacKay & Somps March 30, 2016) now calls for creek improvements to start with the recordation of the 150th bedroom, the final phase of the plan is still deferred to 40% buildout or the 600th bedroom. We continue to recommend the entire creek project should be completed within two years.

This will harmonize with planned meadow reach improvements planned over the next two years and ensure that lack of upper stream improvements does not jeopardize downstream restoration. The FEIR response to comment 2-53 does not respond adequately to our DEIR comment which concludes that early restoration of the creek is needed to address "project stream impacts which will be additive to the existing impacts in this

4

impaired system..." This early restoration would certainly not be inconsistent with Policy 6.A.11 requiring restoration as a part of development activities, as concluded to the opposite in FEIR response 2-53.

09-5 (cont.)

On the restoration phasing issue, the FEIR also notes that the amount of money to be spent by the developer on the creek will be proportional to the size of the project approved by the Board of Supervisors. But, there are other sources of funds for this work. For example, the Friends of Squaw Creek have secured grant funding. The rehabilitation of the creek is essential and will proceed with or without the proposed project. As a result, contrary to the conclusion of the EIR consultants, it is not infeasible to start work early on its restoration.

09-6

9. Cumulative Population Impacts Not Discussed. The proposed Village is not the only development forecasted for Squaw Valley. Within the same 25-year period, the WSA projects more than 1000 additional bedrooms in Squaw Valley alone. These include developments planned for the Resort at Squaw Creek, the Palisades, the Olympic Estates, the Plumpjack, and the Poulsen property. Although assumptions about occupancy rates were amended in the FEIR, the effects of cumulative population increases were not addressed.

09-7

Additional Environmental Review/Recirculation Needed. The FOSV recommended design features/mitigation measures discussed above must be made part of a revised Reduced Scale Alternative and/or mitigation package in a recirculated DEIR in order to ensure the adequacy of environmental review under the California Environmental Quality Act and to provide a full range of options to the decision makers.

The Friends of Squaw Valley recommends that the development, as proposed, must NOT be approved. Overriding Considerations not possible. The project as mitigated by the FEIR in its current form does not provide enough social, economic, or environmental benefits to Squaw Valley, the greater Truckee-North Tahoe region, and Placer County to outweigh the environmental damage that will result, and, therefore, would not justify a Finding of Overriding Considerations and must not be approved.

Sincerely,
Laurie Oberholtzer
Environmental Planner
for
Friends of Squaw Valley

5

09

Friends of Squaw Valley
Laurie Oberholtzer, Environmental Planner
June 9, 2016

09-1 The comment expresses support for the Reduced Density Alternative. The comment also reiterates previous comments requesting additional revisions to the project and alternatives. However, the comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

09-2 The comment states that traffic volumes are still underestimated based on actual peak average winter ski conditions. This issue was addressed in the FEIR (see response to comment O2-27) and is also addressed in response to comment I4-1 in this document.

Further, the comment states that reduction of acceptable traffic standard to LOS F is not appropriate, and the FEIR response to previous comment O2-23 was not adequate. However, the comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

Finally, the comment states that traffic mitigation is "still passed on to further study." The effectiveness of proposed traffic mitigation measures was addressed in the FEIR (see especially the Master Response regarding traffic) and throughout this document. Regarding the three-lane coning program, see the Master Response regarding traffic (especially, page 3-28 of the FEIR). The comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR. Therefore, no further response is provided here.

09-3 The comment states that a better mass transit plan to reduce traffic impacts is needed. This issue was addressed in the FEIR in responses to comment O2-29 through O2-32 as well as the portion of the traffic Master Response in the FEIR that addresses transit service. Also, see response to comment O4-12 of this document regarding expanded transit service. Regarding the request to add transit next ski season (which is prior to when the project would be constructed) rather than after the 150th bedroom is constructed, the mitigation in the EIR is tied to when the project would generate impacts. The ski resort can enhance transit prior to this if it desires, but this would be apart from the project impacts/mitigation requirements.

09-4 The comment states that the FEIR does not provide verification of water availability, and does not meaningfully analyze environmental impacts due to groundwater drawdown. This is incorrect. Both the DEIR and FEIR address this issue. See Chapters 6, "Biological Resources," and 13, "Hydrology and Water Quality," in the DEIR. In the FEIR, see Section 2.2, "Updated Water Supply Assessment and Groundwater Data," as well as responses to comments O2-51, O2-52, and O2-56 regarding groundwater drawdown. Because the comment does not provide any new information regarding the content or analysis in the EIR or identify specific deficiencies in the responses in the FEIR, no further response is provided here.

The comment also states that while the FEIR includes some monitoring of riparian vegetation and well operations, there is no commitment to scale back or stop if adverse impacts occur or performance metrics are not met. This is also incorrect. Mitigation Measures 6-1a, 6-1b, and 6-1c were revised as shown in the FEIR in response to comments received on the DEIR. Contrary to the comment's assertion, performance measures are included in the revised

mitigation measures. Also, see responses to comments 02-56, 02-57, and 02-66 in the FEIR.

Finally, the comment suggests that Placer County appoint an appropriate agency to ensure adequate water supply. The Squaw Valley Public Services District already provides this service.

09-5 The comment reiterates previous comments that recommend approval of only a Phase 1 project, or the Reduced Density Alternative. This issue is addressed in the FEIR (see the Master Response regarding the Reduced Density Alternative on pages 3-59 through 3-63 in the FEIR).

The comment also suggests that the maintenance yard be moved to preserve Shirley Canyon. The FEIR Master Response regarding the mountain maintenance facility provides a summary of the environmental effects of this proposed facility, which is a component of the project, and was evaluated throughout the DEIR. The comment states that FEIR response to comment 02-90 and the Master Response were not adequate and that a serious potential impact could result from a major change in a combination of land uses to be permitted. Potential for land use conflicts associated with this project component is addressed in the FEIR Master Response regarding the mountain maintenance facility (FEIR pages 3-82 and 3-83). Regarding the comment about cumulative impacts, CEQA does not require EIRs to collectively evaluate impacts of, for instance, traffic, biology, and cultural resources as a "cumulative impact" that differs from the individual impacts of each of these resource issues, and no evidence that an impact was not addressed has been provided. In other words, the traffic, biology, and cultural resource impacts do not, when considered collectively, suggest that any of these individual impacts are exacerbated by the combination of all of them. For further details about the cumulative analysis, see the Master Response regarding the cumulative analysis in the FEIR beginning on page 3-63.

Finally, the comment states that full Squaw Creek restoration should occur in the initial construction phase. See response to comment 014-2 in the FEIR regarding timing of creek restoration. Advancing the creek restoration to the first phase of project construction would not reduce the effects of project buildout, nor residual wetlands impacts (they would be mitigated, at the latest, as impacts occur), and therefore need not be considered as an alternative. Regarding the comment that other sources of funding are available for creek restoration, financial issues such as these are not a physical environmental effect under CEQA and need not be included in an EIR or other CEQA analysis. The Placer County Board of Supervisors will consider this issue during project deliberations.

09-6 The comment indicates that although assumptions about occupancy rates were amended in the FEIR, the effects of this population increase were not evaluated. Refer to the discussion of evidence supporting occupancy data used in the DEIR in the Master Response regarding occupancy assumptions in the FEIR (pages 3-68 through 3-71). As discussed therein, the 2.2 percent increase in assumed occupancy used in the 2015 WSA "provides a marginally more conservative basis for assurance that water can be adequately supplied over the period of record," but "does not, in any way, suggest the 55 percent annual occupancy, in light of the data above, is not supported by substantial evidence ….Issues affected by the increase in water use based on the 2015 WSA update are associated with biology and hydrology as they related to groundwater." These resource areas are discussed in the Master Response regarding water supply in the FEIR. Regarding impacts associated with population increases from the cumulative development, see Chapter 18.1 of the DEIR, which addresses the full range of impacts that could result from cumulative development and the associated population.

09-7 The comment states that additional environmental review/recirculation is needed. However, for the reasons described in response to comments 09-1 through 09-6, above, and throughout the FEIR and this document, the EIR analysis is adequate and no changes to the EIR are necessary. Also, see the Master Response regarding recirculation in the FEIR.

The remainder of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the EIR. Regarding the comment that a statement of overriding considerations is not justified, see response to comment 010-6 in this document.

THE FRIENDS OF SQUAW VALLEY POSITION
ON THE PROPOSED VILLAGE AT SQUAW VALLEY PRO.
5-1-16

010

SUMMARY

Upon reviewing the Final Environmental Impact Report (FEIR), the April 2016 revised Specific Plan, and the March 2016 Master Phasing Plan for Squaw Valley Real Estate's (SVRE) proposed Village at Squaw Valley, the Friends of Squaw Valley (FoSV) continue to contend that the development proposal of 1500 bedrooms causes too many significant and unavoidable impacts. **The project, as proposed, must NOT be approved** by Placer County. Furthermore, the mostly dismissive FEIR offers only minor changes to the draft EIR (dEIR). Citing constraints of CEQA, it defers to the Board of Supervisors the decision to correct underestimations of environmental harm and the obvious conclusion that the project must be downsized. A revised project must be submitted at a size that reduces the impacts to an acceptable level in keeping with the benefits to the local and regional area. This updated position paper provides the basis for this contention, as well as compelling considerations on other elements in the County decision process.

010-1

Project must be scaled back: The buildable acreage remaining in Squaw Valley is extremely small (unlike many other ski area villages) and the environment is very sensitive to overdevelopment. It is disappointing that the FEIR only reduced three (of the 23) significant and unavoidable impacts resulting from the SVRE's proposal. Serious environmental concerns remain regarding traffic (already awful; flawed analysis), noise (rubber road is not enough), scenic views (108-foot MAC remains), water (hypothetical modeling assumptions of virtual wells), population (flawed occupancy assumptions; insufficient on-site employee housing) and pollution (loss of night sky; more greenhouse gases). The only way to diminish these impacts is by reducing the number of bedrooms (aka population).

The FEIR acknowledges a "potentially feasible" solution with the alternative (17.3.4) that poses a reduction to 50% of the bedrooms in order "to avoid or substantially reduce" the significant environmental impacts. The developer claims "critical mass" is needed for financial feasibility but economic analysis is, to date, absent, although it is promised "10 days prior to commencement of entitlement hearings." The Board of Supervisors will determine the proper project size, hopefully balancing benefits and impacts.

Overriding Considerations not justified: The Board of Supervisors may only approve a project with significant and unavoidable impacts by making a finding of "overriding considerations" wherein benefits are determined to outweigh the severity of the environmental harm. The FEIR is disappointingly dismissive of over 300 concerns and, limited by CEQA, leaves the social and economic impacts to the decision of the Board of Supervisors. FoSV contends that the benefits of the proposed project to Squaw Valley, the greater Truckee-North Tahoe region, and Placer County do not outweigh the environmental damage and, therefore, would not justify such a Finding.

Conditions of Approval required: While FoSV rejects this current project proposal, and regardless of the number of bedrooms approved, we believe any Village project approval must have additional requirements imposed on the developer. FoSV includes in these a reduced entitlement timeline, traffic

mitigation accountability, enhanced valley transportation (needed now), rigorous monitoring to confirm adequate water supply, and performance metrics to ensure a viable and sustainable village.

INTRODUCTION

The Friends of Squaw Valley (FoSV) is a group of over 500 residents, second homeowners, and visitors formed in response to Squaw Valley Real Estate's (SVRE) proposed Village at Squaw Valley. Our mission statement calls for " environmentally sustainable, economically viable, and aesthetically compatible development in Squaw Valley while preserving its community character". We seek a Village development that balances the impacts of development with benefits to Squaw Valley and the region.

O10-1 (cont.)

We request that Placer County take the following actions in regard to the proposed Village at Squaw Valley Specific Plan.

I. PROJECT MUST BE SCALED BACK

Squaw Valley is geographically constrained as a small box canyon served by a single, narrow, 2-mile long road. It is the primary residence of about 500 households, the 2nd home for thousands more, and a recreation destination (including golf course and ski area) for additional tens of thousands. As a result of its small size and existing usage, there is very limited space for additional large-scale development. Moreover, access to Squaw Valley is through the narrow Truckee River corridor with little likelihood of ever widening the existing two-lane Highway 89. Any development within Squaw Valley impacts the entire Truckee-North Tahoe region.

The proposed Village project would allow condos, condo/hotels, and fractional ownership homes totaling 1500 bedrooms. In addition, it foresees 300,000 square feet of new commercial development, remote parking structures, and a 90,000 square foot Mountain Adventure Camp (MAC) primarily featuring a controversial indoor water park. The build-out is projected to take place over a 25-year entitlement period.

FoSV contends the following concerns must be addressed:

Number of Bedrooms - FoSV's primary concern with the proposed development is the number of bedrooms proposed. The remaining significant and unavoidable impacts cannot be adequately mitigated without a decrease in bedroom count. The FEIR confirms a 50% reduced density alternative (from 1500 to 750 bedrooms) would "reduce significant environmental impacts and was deemed to be potentially feasible." Unfortunately, the FEIR did not analyze the combination of 50% reduced density with reduced heights.

- Impacting this analysis is the on-going contention that the FEIR contains two fundamental flaws that understate the environmental impacts. These areas must be reanalyzed before any determination in number of bedrooms is made.

Traffic – CEQA requires that the "traffic volume should represent the peak average winter ski conditions". The winter of 2011-12 used in the dEIR was significantly below average, with records showing almost no snow through the Christmas/New Year and MLK holidays. Because the peak traffic was low during those periods, then all impacts (such as noise and pollution) were therefore underestimated.

O10-2

The Final EIR dismissed this argument, contending that since a significant amount of snow fell in the 2011-12 winter AFTER Presidents' Weekend, the skier, and therefore auto, traffic was representative. A careful reading of the FEIR response shows that even the authors did not believe this. They wrote "The comment is valid in that during a "good season" in which significant snowfall occurs in December and January, many of the busier days of the season occur during these months." The winter just passed, 2015-16, clearly showed that in an average winter, the heaviest days are during Christmas and the Jan-Feb holiday weekends.

Water - Hydrologists and others question the accuracy of the Water Supply Assessment (WSA). The FEIR states that the ongoing California drought "may produce a more severe multiple year drought than any within the available historical dataset or model study period". Although the last 3 years of drought were incorporated into the updated WSA, uncertainty of climate change and more extreme drought conditions were not analyzed. The FEIR does not provide the verification of water availability, only assessment calculations by computer modeling. Environmental impacts due to groundwater drawdown were not analyzed in any meaningful manner. Some monitoring of riparian vegetation and well operations has been added but there is no commitment to scale back or stop if adverse impact occurs or performance metrics are not met. There remains no commitment to an oversight committee to monitor for adverse impact.

O10-3

Mountain Adventure Camp – SVRE's proposal includes a controversial 90,000 square foot recreation center (aka MAC). The FEIR yields to the developer's premise that the MAC is the only way to meet "key project objectives …(of) providing a year-round destination resort." Other "attractions" were not analyzed. With a (reason not justified) height of 108 feet, this structure overwhelms one's initial view of the village. Moreover, FoSV contends such a "water park" is "not authentic" and out of character in a place with an abundance of year round outdoor recreation. If such "indoor amenities" are to be allowed in the project by Board of Supervisor decision, FoSV advocates that the building be downsized or moved to a less visible location, or better still, that the amenities be spread out over the entire village.

O10-4

Cumulative Impacts - To make matters worse, the proposed Village is not the only development forecasted for Squaw Valley. Within the same 25-year period, the WSA projects more than 1000 additional bedrooms in Squaw Valley alone. These include developments planned for the Resort at Squaw Creek, the Palisades, the Olympic Estates, the Plumpjack, and the Poulsen property. Although assumptions about occupancy rates were amended, the effects of cumulative population increases were not addressed.

O10-5

FoSV is committed to "environmentally sustainable" development in Squaw Valley. Only with serious review of the above concerns can the Planning Commission and the Board of Supervisors determine where the tipping point is between population growth and level of impact.

II. OVERRIDING CONSIDERATIONS NOT JUSTIFIED

Under California Law, the County can only approve projects with significant and unavoidable environmental impacts by making a "Finding of Overriding Considerations". In creating such a Finding, the Board must "balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks (CEQA 15093)". Such a "finding" will look principally at economic considerations (e.g. tax revenue and jobs), but FoSV contends there are still no factors of sufficient benefit to override the environmental damage caused by the increased population density of 1500 units. Consider the following:

Tax Revenue: New hotels and condominiums will produce additional property tax and "Transient Occupancy Tax" (TOT) to Placer County. However, with the major developments planned throughout the North Lake Tahoe region, highlighted by new developments at Homewood, Northstar, and Martis Valley, a reduction in density in Squaw Valley would have a negligible impact on Placer County's TOT revenues.

C10-4

Jobs: A reduction in Village density would have only a slight impact on construction jobs in the North Tahoe area. Consider again the other developments planned throughout the North Lake Tahoe region, and recall the 1,000 additional bedrooms planned within Squaw.

Rehabilitation of Squaw Creek: This is the single specific, Squaw Valley-only, beneficial impact of the project. The FEIR opines that the amount of money to be spent by the developer on the creek will be proportional to the size of the project approved by the Board of Supervisors. But, there are other sources of funds for this work, e.g. the Friends of Squaw Creek have secured grant funding. The rehabilitation of the creek is essential and will proceed with or without the proposed project.

III. CONDITIONS OF APPROVAL

The County has the authority to impose "Conditions of Approval" on the developer that pertain to subjects not analyzed in the dEIR, impacts whose mitigations were simply inadequate or land use issues that were not addressed. While we do not approve of the currently proposed project, even a scaled back project requires the following conditions:

1. **Squaw Creek Rehabilitation**: The developer has submitted a plan to significantly improve the current condition of Squaw Creek. Rehabilitation of the creek improves its natural function and enhances the natural beauty of the area. While the Master Phasing Plan (MacKay & Somps March 30, 2016) now calls for creek improvements to start with the recordation of the 150th bedroom, the final phase of the plan is still deferred to 40% buildout or the 600th bedroom. We continue to recommend the entire creek project should be completed within two years. This will harmonize with planned meadow reach improvements planned over the next two years and ensure that lack of upper stream improvements does not jeopardize downstream restoration.

2. **Phasing of Construction**: To avoid isolated buildings that give the resort an "unfinished" look, construction phasing in the Village – Core Commercial area must maintain harmonious continuity with the present village. Phasing should not just be dependent on economic conditions. This concern was not addressed in the latest phasing plan document.

3. **Limits on Construction Traffic**: Construction traffic must be limited to 8AM to 6PM during weekdays only. Also, construction traffic should not be allowed until the snowplows have totally cleared the roads, nor during triple coning, nor times of high visitor traffic. No commitments were made in the FEIR to modify the egregious Placer County construction times of 6am to 8pm M-F and 8am to 8pm on weekends.

4. **Traffic Density Mitigation**: The FEIR admits, in the traffic response, what is obvious to everyone – "Winter peak hour and daily conditions along Squaw Valley Road are already unacceptable "and the Village Project will just make it worse. The developer must be creative on how to address this issue NOW beyond the reliance on triple coning. The comment letters offered many possible solutions but all were dismissed. Some were simple (Three, not two, "crosswalk facilities" should be completed along Squaw Valley Rd), some were harder (have signs alerting people on traffic conditions before entering Highway 89), and some (and most needed) were dismissed as impossible (triple lane Highway 89 for a dedicated bus lane). At the minimum, an oversight and advisory committee should be formed to oversee the traffic conditions.

5. **Confirmation of Adequate Water Supply**: Placer County must appoint an appropriate agency for insuring the adequacy of the water supply. This monitoring program should be established before any project permits are issued, define quantitative measures of "adequate", and include (i) stop action criteria if adverse thresholds appear, (ii) verification of adequate supply as a prerequisite to each new project, and (iii) criteria for responding to impacts on aquifer drawdown as well as on the creek and riparian environment. While the FEIR expands on proposed monitoring, it does not commit to an actual water management action plan with "stop development" action thresholds or a prearranged consequence of adverse impacts.

O10-6 (cont.)

6. **Reassessment of Entitlement Approvals**: The developer requests entitlements for 25 years, but FoSV believes that 25 years is too long because unforeseen changes may occur. Instead, initial entitlements must be limited to 10 years. Additional entitlements should be granted only after an independent and comprehensive analysis is done that includes actual environmental impacts compared to those projected in Final EIR, as well as performance metrics in occupancy, economic impacts on the greater North Tahoe community, changes to climate, and economic trends in the ski, leisure and recreational industries.

7. **Preservation of Shirley Canyon**: Because LOT 19 proposes heavy maintenance operations at the mouth of Shirley Canyon and at the edge of Squaw Creek, a zoning change from Conservation Preserve and Forest Recreation to Village - Heavy Commercial is required. Potential spill of propane or vehicle maintenance fluids (diesel, oil, cleansers) poses substantial risk to Squaw Creek. The transit of numerous propane trucks to and from this location could create a potential disaster for the entire valley. Incredibly, the developer now plans additional subsurface propane tank placement at Lot 28, even closer to the creek.

8. **Provide Transportation within Squaw Valley**: To mitigate traffic by residents and visitors staying in the valley and to reduce parking in the resort lots, the developer once proposed a scheduled, on-demand transportation system. We are heartened to see the revised (April 2016) Specific Plan commits to new shuttle service within Olympic Valley, but discouraged that it will not start until recordation of the 150th bedroom. Even though this represents a Village development mitigation, we suggest this program be initiated, at least on busy days, during the next ski season.

9. **Reduce Existing and Expected Noise**: Noise standards along Squaw Valley Road already exceed Placer County standards. This SVRE proposal will exacerbate that condition. Homes along the north side of the Village area suffer magnified noise due to the echo effect of the box canyon location. We are curious about the proposed Rubber Hot Mix Asphalt surface coating to the main road. Reduction of 5 decibels would be welcome but health and safety concerns warrant further investigation before this mitigation is installed.

10. **More Substantive Parks and Recreation Improvements:** The inclusion of Parks & Recreation (P&R) improvements is a County requirement and the dollar amount is a function of the allowed bedroom count (i.e. population). Currently, most of the proposed P&R improvements involve enhancing existing hiking trails (although flush toilets at trailheads and a linear interpretative trail along the creek are included). However, these hiking trails already exist, and have been used for years. The FoSV advocates that the money must be spent on more substantive facilities for the local community to use throughout the year.

O10.5 (cont.)

11. **Transfer fees:** The developer has offered to provide some "transfer fee" on real estate sales to go to a community benefit fund. This must be memorialized as a commitment, "in perpetuity", to come from both initial sales and resales of all real estate transactions, and be committed to benefitting the environment of Squaw Valley. It should be overseen by a local non-profit organization that has representation from primary and secondary homeowners as well as the business community and the developer(s).

IV. BALANCING IMPACTS AND BENEFITS

In keeping with its mission, FoSV believes that the population density of the proposed Village development is too great and that the resulting impacts are incompatible with the alpine environment of Squaw Valley. A reduction in size is needed to find the balance point between benefits and impacts.

The Friends of Squaw Valley recommends to Placer County officials that the development, as proposed, must NOT be approved. Rather, the following steps should be taken. First, the Planning Commission must direct that the areas of traffic and water be reanalyzed to more accurately determine the real, resulting impacts. Second, the Planning Commission must recommend and the Board of Supervisors must agree to reject the proposed project as having too severe an environmental impact without sufficient local and regional benefits. And third, the Board of Supervisors must **require a recirculated, revised Specific Plan be submitted to the County at a bedroom count level that brings the impacts to an acceptable level.**

010 Friends of Squaw Valley

010-1 The comment expresses support for the Reduced Density Alternative, indicating a position that the project should not be approved as proposed and would be more appropriate for the location if scaled back. Responses to specific comments are provided below.

010-2 See response to comment letter I4 in this document regarding the use of 2011-2012 ski season data to represent existing winter conditions. Note that the impacts of the project are based on a peak ski day, and representative peak ski days occurred in 2011-12. Also, see response to comment 05-2 in this document.

010-3 See response to comment 09-4 in this document regarding water supply adequacy. As to a "verification" of water availability, beyond the analysis in the EIR it is unclear what additional information is being sought. Based on California Water Code requirements, a water supply verification is required, in certain instances, once a subdivision map for a project is submitted, and a subdivision map is not included as part of the proposed approval.

010-4 See the Master Response regarding the MAC, which discusses compatibility with surrounding uses and the Olympic Valley, size (including height), traffic generation, water use, effects on water quality, and alternatives including the suggestion that the MAC facilities could be distributed throughout the VSVSP plan area, rather than contained in a single building. It is noted that the EIR does not support the MAC, rather, it evaluates the impacts of constructing the MAC. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

010-5 The comment indicates that although assumptions about occupancy rates were amended in the FEIR, the effects of this population increase were not evaluated. Refer to the discussion of evidence supporting occupancy data used in the DEIR in the Master Response regarding occupancy assumptions in the FEIR (pages 3-68 through 3-71). As discussed therein, the 2.2 percent increase in assumed occupancy used in the 2015 WSA "provides a marginally more conservative basis for assurance that water can be adequately supplied over the period of record," but "does not, in any way, suggest the 55 percent annual occupancy, in light of the data above, is not supported by substantial evidence ….Issues affected by the increase in water use based on the 2015 WSA update are associated with biology and hydrology as they related to groundwater." These resource areas are discussed in the Master Response regarding water supply in the FEIR. Also, see response to comment 09-6 of this document.

010-6 The commenter claims that the findings of overriding considerations in support of project approval are not justified and do not outweigh the significant impacts of the project. The commenter goes on state their opinion that the project benefits would be relatively small when viewed at a regional level. The commenter states that a reduced scale project would have a negligible negative impact (when compared to the project) on Transient Occupancy Taxes and jobs in the greater North Lake Tahoe region, and that the restoration of Squaw Creek is the only beneficial impact of the project that is exclusively a benefit to Squaw [Olympic] Valley.

A specific response to the claim that the project benefits do not outweigh the project impacts is not provided here as the County's detailed CEQA Findings of Fact are attached to the Board staff report. Please refer to the project findings for the County's analysis detailing the County's findings that the project benefits outweigh the project's significant impacts. It

should be noted, however, that the project is of regional significance. Accordingly, project benefits derived from the "above and beyond" contributions memorialized in the Development Agreement should include regional benefits as well as localized benefits to Olympic Valley. A detailed discussion of the benefits that would be secured in the Development Agreement is included in the Board staff report.

In addition to restoration of Squaw Creek, direct non-economic benefits to Olympic Valley include significant enhancement to public recreation facilities through construction and dedication of $3.6 million dollars of public recreation improvements plus payment of an additional $2.7 million dollars in Park and Recreation fees that would be used to construct additional public park improvements within park dedication fee area #2 (which includes Olympic Valley), payment of "above and beyond" fees into the TART transit system to expand public transit services to Olympic Valley and throughout the Resort Triangle, payment of $800,000 for projects within the Olympic Valley area that would improve the environment and/or public safety, construction of employee housing for a minimum of 250 new and existing Resort employees, payment of $500,000 to support regional housing initiatives for the Tahoe Sierra region thereby providing expanded affordable housing opportunities in Olympic Valley and the region, and dedication of land for a new 24-hour per day west valley fire station at the Resort base. The cost of the land, permitting, construction, equipment and initial staffing of the fire station would be borne 100 percent by the project developer. While some of the above described benefits would not be accrued exclusively to Olympic Valley, the community of Olympic Valley would be the primary benefactor. The County Board of Supervisors will ultimately determine if the project benefits are sufficient to override the impacts reported in the EIR.

The commenter goes on to state the opinion that the project should be scaled back and that additional conditions should be imposed on the project. The commenter previously raised several of the same issues in response to the DEIR and the County provided responses in the FEIR. Accordingly, some of the responses below direct the reader to analyses in the DEIR or to a specific response in the FEIR.

Squaw Creek Restoration

The commenter claims that the requirement to commence stream restoration upon recordation of the Final Map that records the 150th bedroom and to complete restoration by recordation of the Final Map that creates the 600th bedroom (40 percent of the project build out) is inadequate and that the entire stream restoration project should be completed within two years of specific plan approval.

The County's analysis determined that the pace of construction of the stream restoration project is consistent with the pace of development and is sufficiently frontloaded into the schedule of required project improvements. The County further determined that construction of the entire stream restoration project would not be feasible in a shorter time period due to the number of existing facilities, including but not limited to surface parking, volumetric snow storage and drainage facilities that must be relocated and reconstructed in order to complete restoration of the Squaw Creek Trapezoidal Channel and the Olympic Channel. In addition to these physical constraints, the cost of improvements must be proportionate to the overall phasing of all plan area improvements to ensure that project phases are not unduly burdened by excessive costs. For these reasons, County staff has determined that the phasing schedule is appropriate and achievable.

Project Phasing

The commenter claims that project phasing must maintain "harmonious continuity" with the existing Village and that phasing should not just be dependent on economic conditions.

Project phasing is not dependent on economic conditions alone. The project is not only a new development project but redevelops the existing ski resort base area. The preponderance of the existing resort base area is already developed with uses such as parking, mountain maintenance, snow storage and utility infrastructure that are critical to the ongoing function of the Resort. Each of the existing Resort facilities must be demolished, relocated and reconstructed and new facilities built in order to implement development of the project. Accordingly, a detailed Master Phasing Plan is included with the project entitlements. The Master Phasing Plan details all of the project-serving improvements (both existing and proposed) and public serving improvements that must be constructed. Each of the improvements include multiple triggers, such as lot by lot infrastructure service requirements and secondary triggers based on bedroom count, to ensure that the necessary project serving and public serving improvements will be in place as each project phase is approved and constructed. In addition, the specific plan includes highly detailed development standards and design guidelines that all project phases would be required to comply with. The application of these planning tools during the review and implementation of each of development phase would ensure that new improvements are harmonized with existing improvements as the plan area is built out.

Limits on Construction Traffic

Construction traffic was addressed in the DEIR (see Impact 9-8) and FEIR (see the portion of the traffic Master Response regarding consideration of construction impacts). Also, see the FEIR Master Response regarding noise beginning on page 3-38 for a discussion of construction hours.

Traffic Density Mitigation

See response to comment 09-2 regarding traffic mitigation.

Confirmation of Adequate Water Supply

See response to comment 09-4 regarding water supply adequacy.

Reassessment of Entitlement Approvals

The commenter states that the 25-year entitlement period is too long because unforeseen changes could occur and that implementation of the specific plan should be limited to 10 years. The commenter further states that, “Additional entitlements should only be granted after an independent and comprehensive analysis is done that includes actual environmental impacts compared to those projected in the FEIR, as well as performance metrics in occupancy, economic impacts on the greater North Tahoe community, changes to climate, and economic trends in the ski, leisure and recreational industries.”

The comment implies that the CEQA analysis is inadequate; however, the comment provides no specific examples of how the analysis is inadequate so no specific response can be provided. Each phase of the project would be subject to subsequent conformity review in accordance with Section 8.3.5 of the specific plan (Environmental Review) to determine if the project phase would be consistent with the certified FEIR prepared for this project and with the requirements of the Mitigation Monitoring Reporting Plan. Should conformity review determine that any of the project impacts would be more severe than described in the FEIR, that new previously undisclosed impacts would occur or that the project would not comply with elements of the mitigation monitoring reporting plan, the project phase would be subject to additional CEQA review in accordance with State Planning Law and CEQA. In effect, the commenters request is already built into State Planning Law and CEQA, which governs the public project review process and implementation of the specific plan.

Preservation of Shirley Canyon

The commenter states that a zoning change is required to implement construction of the mountain maintenance facility on Lot 19. This comment is correct. The commenter further states that potential spill of propane or vehicle maintenance fluids pose a risk to Squaw Creek as does the transport and storage of propane at this location, where an underground propane storage and distribution facility would be constructed. The commenter goes on to state that the project now proposes to include placement of underground propane tanks on Lot 28.

These issues were analyzed in the DEIR and FEIR, and mitigation measures were identified (see, in particular, the FEIR Master Response regarding the mountain maintenance facility). Lot 28 was previously identified as a potential location for a portion of the project propane storage. However, consultation with the Squaw Valley Fire Chief determined that this location would be infeasible for a variety of reasons and the specific plan has been modified to limit the establishment of a bulk propane storage and distribution facility to Lot 19 only (the East Parcel will include a single bulk propane tank to serve the East Parcel land uses). Please also see response to comment 09-5 of this document.

Provide Transportation within Squaw Valley

The commenter states that they are pleased to see that the project would implement an "on-demand transportation system" for residents and guests in Olympic Valley, but are disappointed to see that it would not be implemented until recordation of the Final Map that creates the 150th project lodging room. The commenter goes on to state that the program should be implemented, at least on busy days, during the next ski season (2016/2017).

The Resort already operates an in-valley private shuttle service that operates between the Village and the Resort at Squaw Creek, and between the Resort base area and the Alpine Meadows Resort base area. The service is expected to continue and to expand as project phases are implemented including the expansion of service into residential neighborhoods. As the first phase of the project would likely include at least 150 bedrooms of lodging development, the County anticipates that the expanded service would be conditionally implemented upon recordation of the first Final Map. Since this is sufficiently early in the development of the project, the expanded service should be available when the first project phase is implemented. Furthermore, since no discretionary entitlements are required to implement expanded private Resort shuttle service the project proponent could voluntarily implement the expanded service prior to implementation of the first phase of development. Please also see response to comment 09-3 of this document.

Reduce Existing and Expected Noise

Noise—both from project construction and operations—was addressed in the DEIR (see Impact 11-1 through 11-5) and FEIR (see the Master Response regarding noise). Also, see response to comment I5-3 in this document regarding potential secondary effects of installing rubberized asphalt to reduce traffic noise.

More Substantive Parks and Recreation Improvements

The commenter states that most of the proposed park and recreation improvements involve enhancement of existing hiking trails, that these trails already exist and that they have been in use for years. The commenter goes on to state that the park and recreation improvements should include more substantive facilities that would be available for use by the local community throughout the year.

Improvements to existing on-mountain hiking trails is a component of the park and recreation plan, but the plan encompasses far more improvements than implied by the

commenter. In addition to improving existing hiking trails to a U.S. Forest Service Class 3 standard and dedication of public access easements for use of those trails, the project would construct new Class 1 biking and hiking trails, a linear park along Squaw Creek, public parking and flush restrooms at the Granite Chief trailhead and at the Shirley Canyon trailhead, conversion of the existing pit toilets at Squaw Valley Park to flush restrooms including construction of a sewer connection and lift station, children's seasonal play area, seasonal dog park and other related improvements. The total value of constructed improvements, not all of which are listed in this response, is estimated at $3.6 million dollars. The project would also contribute an additional $2.7 million dollars in Park and Recreation fees that would be utilized to construct other park and recreation improvements in park and recreation fee district #2, which includes Olympic Valley, Alpine Meadows and the Truckee River corridor. This level of public park and recreation improvements, which are applied to a hospitality project, is commensurate with County requirements for a comparably sized multi-family residential project and the County's General Plan Policies 5.A.2 and 5.A.3 to require 5 acres of active and 5 acres of passive parkland per 1,000 residents.

Transfer Fees

The commenter states that the project proposes to establish a real estate transfer fee, that the County should require the transfer fee on all real estate transactions in perpetuity, and that the transfer fee fund should be overseen by a non-profit organization that would commit the proceeds to environmental improvements in Squaw Valley.

The transfer fee is a private fee program and is not included in the project entitlements, conditions of approval or the Development Agreement and no portion of any County required project improvements or mitigation measures rely upon the transfer fee for funding. The commenter is encouraged to contact the project proponent directly to discuss ideas for how the program should be administered.

Project Impact and Benefits

The commenter states that the scale of the project is too large, that the project impacts are incompatible with the alpine environment of Squaw Valley, and that the project should be reduced in scale to improve the balance between the project benefits and impacts. The commenter goes on to state that the analysis of traffic and water should be reanalyzed "to more accurately determine the real, resulting impacts." Regarding this portion of the comment, please see the Master Response regarding recirculation on page 3-109 of the FEIR.

The commenter goes on to state that the Planning Commission and Board of Supervisors should reject the project and require that a reduced scale specific plan be submitted to the County and a revised environmental analysis be conducted for the reduced density project. This portion of comment is reflective of the commenter's opinion of the project and does not raise specific issues so no response is provided.

011

Placer County Planning Commission
3091 County Center Drive
Auburn, CA 95603

Subject: August 11, 2016 Item: Proposed Village at Squaw Valley Specific Plan

Dear Members of the Planning Commission:

The Friends of the West Shore (FOWS) appreciates this opportunity to provide comments on the Proposed Village at Squaw Valley Specific Plan (VSVSP), including the final EIR and staff report. FOWS works toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations, and represents community interests from Emerald Bay to Tahoe City. Although FOWS is concerned with the extensive impacts the VSVSP will have in and around Squaw Valley, our comments focus primarily on impacts that will occur within the Lake Tahoe Basin.

011-1

Unfortunately, the FEIR fails to address many of our concerns and questions regarding the DEIR's analysis of impacts to the Tahoe Basin. The VSVSP will:

- Cause significant and unavoidable traffic impacts within the Tahoe Basin, including impacts to Level of Service (increased congestion) and Vehicle Miles Traveled (VMT);
- Further threaten public health and safety by contributing to traffic that will impede emergency access and evacuation routes; and
- Result in additional air and water pollution in the Basin.

As you heard at your July 7, 2016 hearing regarding another project that will increase traffic in the Basin (the Martis Valley West Parcel Specific Plan) – notably to a smaller degree than the VSVSP, emergency responders are already concerned about heavy traffic conditions.

FOWS asks you to deny this project as proposed, and ensure that if/when a revised alternative is provided, a smaller-sized project is considered, and adequate analyses of impacts and requirements to employ all feasible mitigation options are incorporated. FOWS also recommends that County staff coordinate with the TRPA and other appropriate entities to define and address the capacity of roadways in the North Tahoe/Truckee Region to provide emergency access and evacuation routes prior to contributing further to these problems.

Additional comments regarding the FEIR and staff report are attached. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

I. Vehicle Miles Traveled (VMT) in the Tahoe Basin

As noted in our comments on the DEIR, as well as in the FEIR's response to comments,[1] VMT in the Tahoe Basin negatively impacts the environment (especially water and air quality) and public health and safety (i.e. more congestion impedes the ability of people to evacuate and access by emergency responders, notably already a concern along Tahoe's West Shore[2]). We appreciate the FEIR's attempt to better quantify the VMT impacts to the Lake Tahoe Basin in Master Response 3.1.2.[3] However, our comments regarding the adequacy of the analysis in the DEIR were not addressed, and we remain concerned the project's traffic impacts will be even greater than the significant and unavoidable impacts already estimated in the EIR.

A. Comparison to TRPA's VMT Threshold Standard:

VMT comparison to TRPA Threshold Evaluation:

The FEIR compares the project's in-Basin VMT to the 2010 VMT estimates for the Tahoe Basin, and concludes that the project would not violate the VMT standard because it would increase VMT by 23,842 miles, or 1.2%,[4] and therefore not violate TRPA's regional standard. The 2011 VMT included in TRPA's 2011 Threshold Evaluation Update report (released with the RPU EIS and RTP/SCS EIR/S in 2012) was just 1.5% better than (or below) the TRPA VMT standard,[5] which equates to approximately 30,958 VMT. In other words, if VMT increased by more than 1.5% (or 30,958 miles) above 2011 levels, the TRPA standard would be violated. Although we believe the EIR underestimates the project's traffic impacts (as noted in our comments on the DEIR, and other public comments), the estimated VMT with the VSVSP included is just 0.3% (or 7,116 miles) below the TRPA standard – leaving little room for error before TRPA's VMT standard is violated (a significant impact when considered in terms of cumulative impacts as discussed below). For example, the project's current traffic counts assume just 55% full time occupancy. It is far more likely that occupancy upward of 100% will occur on peak summer Friday (the period upon which VMT is based) – generating far more than the 1.2% increase in the FEIR.[6] In another example, as noted elsewhere in our comments, a recent NLTRA survey found that 47% of visitors to the North Tahoe/Truckee region visited Emerald Bay. This number is far greater than the 0.03%

[1] See FEIR, p. 3.2.4-117 – 118.

[2] http://www.leagle.com/decision/In%20CACO%20151222052/CALIFORNIA%20CLEAN%20ENERGY%20COMMITTEE%20v.%20COUNTY%20OF%20PLACER

[3] "The addition of the project's VMT to the 2010 summer value would result in 2,008,442, which would remain below this VMT threshold…the resulting VMT generated by the VSVSP would not exceed the TRPA VMT threshold (a threshold not used in any of the documents)." (FEIR, p. 3-25 to -26).

[4] "The project's summer Friday VMT estimate within the TRPA boundary is 23,842. Total VMT in the TRPA boundary was estimated in the Regional Plan (at Table 3.3-5) to be 1,984,600 for summer 2010 conditions. The project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary." (FEIR, p. 3-25 & 3-26)

[5] http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf; 2011 VMT was 2,036,642 or 1.5% better than the standard.

[6] We herein incorporate comments submitted on the DEIR and FEIR by Sierra Watch regarding occupancy rate assumptions.

value assumed in the FEIR, Appendix C (excerpt below), suggesting the EIR underestimates the number of visitors that may drive to Emerald Bay.

Guest Trips				
SR 89/Alpine Meadows Rd	State Line	0.05	219	7,990.2
SR 89/Alpine Meadows Rd	Echo Summit	0.02	55	2,167.3
SR 89/Alpine Meadows Rd	Emerald Bay/Camp Richardson	0.03	82	2,161.1
SR 89/Alpine Meadows Rd	South Y	0.03	82	2,530.8
SR 89/Alpine Meadows Rd	Sand Harbor	0.02	55	1,276.4
SR 89/Alpine Meadows Rd	Incline Village	0.06	164	3,188.2
SR 89/Alpine Meadows Rd	Kings Beach	0.05	137	1,780.4
SR 89/Alpine Meadows Rd	Tahoe City	0.12	329	1,547.6
Total		0.47	1,123	22,363.9

VMT Comparison to draft Placer County Tahoe Basin Area Plan EIR/S

According to the draft June 2016 Placer County Tahoe Basin Area Plan EIR/S, released after the final VSVSP EIR, the "*Existing summer daily regional VMT is estimated to be 1,937,070, or 93,868 below the TRPA threshold standard based on the most recent modeling completed to support the Tahoe Regional Transportation Plan (TRPA 2016).*" (TBAP DEIR/S, p. 19-18[7]). In other words, the most recent VMT estimate in the Tahoe Basin is 93,868 miles below violating the regional VMT standard. The VSVSP will add 23,842 miles[8] (which as noted elsewhere, is underestimated) – equal to an approximate increase of 25% of the 93,868 difference. The proposed Martis Valley West Parcel Specific Plan (MVWPSP) estimates 13,745 additional miles of VMT in the Basin,[9] adding another 15%. Traffic counts for 2015 and 2016 are not available yet, however it is clear among locals and visitors that traffic on our roadways has increased substantially over the past two years and traffic from growth outside of the region is expected to continue to grow.[10] It is also obvious from long term trends[11] that traffic fluctuates, and we have experienced much higher traffic levels without any substantial increases in development.

[7] http://www.placer.ca.gov/~/media/cdr/ecs/eir/tahoebasincp/deir/19_cumulative.pdf?la=en

[8] "On a peak travel day, the Project would generate approximately 23,842 VMT within the Tahoe Basin. Total VMT in the TRPA boundary was estimated in the Regional Transportation Plan of TRPA to be 1,984,600 for summer 2010 conditions. Based on this benchmark, which is considered the best available data, the Project would result in an estimated 1.2 percent increase in VMT within the TRPA boundary. The addition of the project's VMT to the 2010 summer value would result in 2,008,442 VMT, which remain below the VMT threshold of 2,067,600. Therefore, the resulting VMT generated by the Project would not exceed the TRPA VMT threshold." (Staff report, p. 33)

[9] http://www.placer.ca.gov/~/media/cdr/ecs/eir/martisvalleywestparcel/finaleirmay2016/appendix1/apdx%20o_vmt_calcs_trpa.pdf?la=en

[10] http://www.sierrasun.com/news/21965274-113/public-meetings-on-tap-to-address-future-of

[11] http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch3_Air-Quality_Oct2012_Final.pdf; see p. 3-17 and 3-49.

We ask the Placer County Planning Commission to consider the impacts this additional traffic will have on Tahoe's roadways, environment, and public health and safety, both individually and cumulatively, and recommend denial of the project as proposed.

B. LOS Impacts in the Tahoe Basin

The FEIR concludes significant and unavoidable impacts to LOS in Tahoe City (Staff Report, p. 57). As local and visitors can attest to, conditions through Tahoe City during peak periods in 2015 and 2016 have frequently reached gridlock. This happened without the additional traffic from Homewood Village Resort, Boulder Bay, Martis Valley West Parcel Specific Plan, the Tahoe Basin Area Plan, the Tahoe City Lodge, or the myriad of other projects currently proposed in the North Tahoe/Truckee Region that will draw more people and cars to the area, and especially without the impacts of the VSVSP. Not only does congestion cause environmental impacts, but it also threatens public health and safety by impeding emergency access by first responders and evacuation routes in the event of an emergency such as a wildfire. Although TRPA may be responsible for land use in the Basin, Placer County is responsible for the protection of the public throughout the entire County; this includes the Lake Tahoe Basin. The VSVSP's additional, significant and presumably unavoidable impacts will only further threaten life, property, and the environment. As you heard at your July 7, 2016 hearing regarding the MVWPSP,[12] emergency responders are very concerned about the impacts of adding more traffic to our roadways.[13]

We ask you to deny this project as proposed and consider a smaller scale development, additional mitigation, and coordination with the TRPA to define the capacity of roadways in the North Tahoe/Truckee Region to provide emergency access and evacuation routes prior to contributing further to these problems.

C. Air quality impacts within the Lake Tahoe Air Basin:

In our comments on the DEIR, we stated the EIR needed to evaluate and disclose the impacts to the Lake Tahoe Air Basin. The FEIR responded with erroneous information, stating that the Lake Tahoe Air Basin is part of the Mountain Counties Air Basin (MCAB),[14] and that emissions for the MCAB were estimated.

A simple view of the California Air Resources Board (CARB) website would have shown that the Lake Tahoe Air Basin is a separate and distinct Air Basin. This is not only

[12] http://www.sierrasun.com/news/22914496-113/martis-valley-west-developer-opponents-look-to-final

[13] Beth Kenna, reading a statement from NTFPD's Chief, stated they "share concern about the added challenges to evacuation," and California Highway Patrol Cpt. Ryan Stonebraker stated that there are limited areas of ingress/egress, and "the more population there is, the more tourists there are, the more things happen. I can tell you that personally just working the Fourth of July." Cpt. Stonebraker also noted that they have bike patrols because that's the only thing that can get around on peak periods like July 3rd.

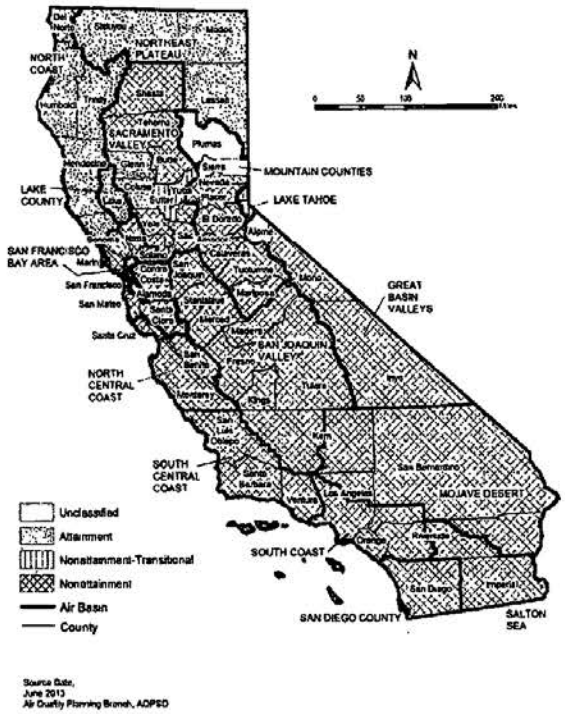
[14] "The air quality thresholds used in the analysis are based on the air basin that would be directly affected by project development and traffic, the Mountain County Air Basin, which includes the Lake Tahoe Basin." (FEIR, p. 3.2.4-116). Also, we remind the FEIR authors that the correct term is the "Mountain Counties Air Basin."

reflected by CARB maps (examples below) clearly delineating the air basins, but also in the CARB's designations for state standards, which clearly indicate individual designations for the Lake Tahoe Air Basin and Mountain Counties Air Basin.[15] It is surprising the document preparers made such an error. In addition, that the TRPA failed to comment on this issue does not negate the public's ability to do so.

http://www.capcoa.org/maps/

[15] http://www.arb.ca.gov/desig/adm/adm.htm#state

2013
Area Designations for State
Ambient Air Quality Standards
OZONE



Source Date,
June 2013
Air Quality Planning Branch, AQPSD

http://www.arb.ca.gov/desig/adm/2013/state_o3.pdf

The EIR fails to evaluate and disclose the air quality impacts of the proposed project in the Lake Tahoe Air Basin.

D. Fanny Bridge Revitalization Project:

The FEIR states that the Fanny Bridge Revitalization Project will "improve traffic conditions at the SR 89/SR 28 intersection, resulting in traffic impacts at this intersection [that are] less severe than identified in the DEIR."[16] However, as noted in our extensive

[16] The Fanny Bridge Revitalization project is listed in Table 18-2 of the DEIR as a cumulative project. Page 18-18 of DEIR describes this project and indicates that at the time the DEIR technical analysis was being completed, a preferred alternative for this project had not yet been selected. Accordingly, the DEIR conservatively assumed no improvements would be constructed at the SR 89/SR 28 intersection for the cumulative conditions analysis. It would have been speculative to assume any of the six alternatives would be constructed because a preferred alternative had not been chosen, particularly given that once completed as estimated in 2018, the Fanny Bridge Revitalization Project would improve traffic conditions at the SR 89/SR 28

O11-4 (cont.)

comments on the Fanny Bridge EIR submitted to TRPA and Placer County,[17] the Fanny Bridge project is likely to result in more traffic impacts in the long term. Therefore it cannot be relied upon to mitigate impacts from the VSVSP.

II. Climate Change:

O11-5

The FEIR also failed to respond to our comments[18] regarding the evaluation of how climate change will affect the project's cumulative impacts. For example, we noted that climate change means increased fire danger, thus questioning how the project will impact the evacuation of people from the area. Also, changes in weather and snowpack will affect water supply. Rather than address this question, the FEIR's response merely focuses on one aspect of our question – regarding the cumulative project list – and fails to address concerns about climate change impacts.[19] As the CEO of Squaw Valley Ski Holdings recently said, "Climate change has already begun to reveal itself as persistent drought in the Sierra Nevada, lower snowpack, increased number and scale of forest fires, and the substantially increased volatility of weather patterns across our great state."[20] It is perplexing that the CEO proclaims concerns over these impacts, yet Squaw Valley Ski Holdings proposes a project that will substantially increase GHG emissions, further threaten public health and safety by placing 1,000's more people in high fire danger areas with only one road to evacuate the valley, and create increased demand for water supplies that may decrease due to climate change (notably all impacts which are dismissed through various claims and/or simply noted as 'significant and unavoidable' while lacking sufficient consideration of mitigation measures in the FEIR).

III. Cumulative Impacts:

O11-6

A. Cumulative Project List:

The FEIR responds to our comments regarding the lack of adequate cumulative analysis (labeled O3-15) by referring to the Cumulative Project List in Table 18-2 of the DEIR: "*Table 18-2 (pages 18-3 through 18-5) in the DEIR provides the list of probable future*

intersection, resulting in traffic impacts at this intersection less severe than identified in the DEIR. See http://www.tahoetransportation.org/fanny-new-1, (FEIR, p. 3-25).

[17] http://friendswestshore.org/fanny-bridges-r-89-realignment/

[18] "The cumulative impacts of these projects need to also be analyzed in light of climate change, which is expected to aggravate existing issues and concerns. For example, with increased wildfire danger, impacts to traffic and emergency access are likely to become more important, and as climate change results in a reduced snowpack, and with the potential for ongoing drought, water supply concerns will increase." (Labeled as comment O3-15, FEIR, p. 3.2.4-112).

[19] "Table 18-2 (pages 18-3 through 18-5) in the DEIR provides the list of probable future projects that are in the project vicinity and that are likely, in combination with the project, to result in cumulative impacts. The list includes 18 projects, most of which overlap with the 10 projects listed in the comment, but also including Truckee and the Tahoe Vision Plan. It does not include projects, such as the Meyers Area Plan and several other projects on the south and south east side of Lake Tahoe because these projects are sufficiently distant that they are not likely to combine with the project to create cumulative impacts. Also, see Table 18-1 in the DEIR for an explanation of the geographic area of cumulative analysis, and the Master Response regarding the cumulative analysis." (FEIR, p. 3.2.4-121).

[20] http://www.laketahoenews.net/2016/05/climate0change-poses-risk-to-nev-economy/

projects that are in the project vicinity and that are likely, in combination with the project, to result in cumulative impacts. The list includes 18 projects, most of which overlap with the 10 projects listed in the comment, but also including Truckee and the Tahoe Vision Plan...Also, see Table 18-1 in the DEIR for an explanation of the geographic area of cumulative analysis, and the Master Response regarding the cumulative analysis." (FEIR, p. 3.2.4-121).

The Cumulative Project List in Table 18.2 does not quantify the potential cumulative impacts from regional area projects; it simply lists the projects. The table also does not include known substantial North Tahoe developments that have been approved but not yet built, (for example, Boulder Bay) or have been in the planning stages for some time (i.e. the Placer County Tahoe Basin Area Plan and the Martis Valley West Parcel Area Plan[21]/Brockway Campground). Notably, the MVWPSP, which is simply listed in the table, estimates increased VMT in the Lake Tahoe Basin to be over 13,000 VMT,[22] or approximately a 0.7% increase. The cumulative impacts of these projects alone (a 1.9% increase) are greater than 1.5% difference between the 2010 VMT and TRPA VMT standard, and therefore based on the FEIR's VMT information, **can be expected to violate TRPA's threshold standard.** This should be clearly discussed and disclosed in the FEIR.

With regards to the referenced Master Response for cumulative analysis, it specifically only responds to projects in the Alpine Meadows area,[23] and therefore does not address the impacts of other regional projects.

B. Cumulative Travel Demand Modeling:

Although the DEIR states that the study area is partially included in the TRPA travel demand model,[24] this does not appear to be the case. Additionally, in October 2015, TRPA staff and Board members discussed concerns about transportation impacts from out of Basin projects, including Squaw Valley.[25] Although TRPA staff appear to have

[21] This Area Plan was proposed within the Tahoe Basin in 2014; the application has been suspended but not withdrawn. Brockway Campground, proposed for the same project area, emerged in January 2015, before the DEIR was released (http://moonshineink.com/news/tahoe-basin-taken-out-martis-valley-west-project).

[22] "On a peak travel day, the project would generate approximately 13,745 VMT within the Tahoe Basin." (FEIR, p. 3-17). FOWS estimates from information included in the DEIR Appendix K indicate over 15,000 VMT, as noted in our comments on the DEIR. MVW DEIR estimates were available months before the release of the VSVSP FEIR, and were notably completed by the same consulting firm. Therefore, it is reasonable to expect the FEIR to include the MVWSP's VMT estimates.

[23] "Numerous comments state that the DEIR's cumulative analysis should have considered projects in the Alpine Meadows area, such as the proposed Base-to-Base Gondola project, Alpine Sierra Development, and White Wolf. These projects are discussed below following a discussion of the CEQA context for cumulative impact analyses." (FEIR, p. 3-63).

[24] "The study area is partially included in the travel demand models of the Town of Truckee and TRPA." (DEIR, p. 18-17).

[25] "Mr. Hester said when the Regional Plan and the Regional Transportation Plan were done they projected what the out of Basin growth would be and those figures were used as a baseline assumption. For near Basin projects we need to ensure that what they generate is within the assumptions we used or if they are not, the new impacts are addressed. When the out of Basin Environmental Impact Statements and Environmental Impact Reports are prepared they have not shown the level of detail on whether the assumptions comply...Projects or area plans environmental documents needs to have an analysis

O11-6

suggested impacts from Squaw Valley had been considered, the most recent cumulative impact analyses (2012) included in the TMPO/TRPA RTP EIR/S and TRPA RPU EIS did not include Squaw Valley (see list of cumulative projects in the Lake Tahoe RTP/SCS Draft EIR/EIS, p. 4-5 to 4-8[26]). The June 2016 draft EIR for the Tahoe Basin Area Plan also applies 'adjustments' to add traffic from the VSVSP and other projects to account for these impacts not being covered by TRPA's previous analysis.[27]

O11-7

C. Assumptions used in VMT estimates:

Our comments on the DEIR questioned the data used to estimate the destination of trips in the Tahoe Basin (and therefore, the VMT). The only source for such assumptions presented in the DEIR appears to be the guest and employee surveys in the DEIR, which do not specify the destinations taken on all trips. We also presented recent information suggesting that a larger number of guests may potentially drive along Tahoe's West Shore to visit Emerald Bay (as well as other in-Basin locations):[28]

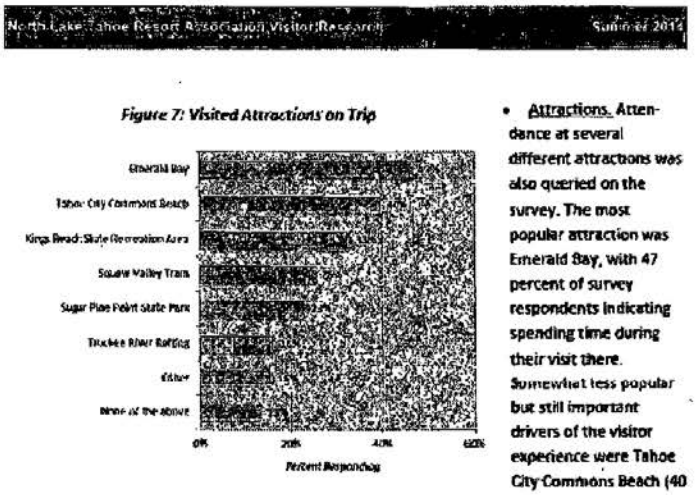
> "The DEIR indicates traffic will be generated on Tahoe's west and north shores, but surveys do not address the intended location of Squaw Valley guests in the Lake Tahoe Basin. For example, as reflected by the data presented on pages 9-17 through 9-21, survey questions asked how many trips guests took outside of Squaw Valley. But there were no questions regarding *where* the trips were made to. Notably, a recent survey of visitors throughout the Tahoe/Truckee/Squaw Valley Region17 found that "*The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there.*" (p. 6). In fact, more visits were made to locations within the Tahoe Basin than elsewhere:

comparing those to the Regional Plan and an analysis comparing the cumulative totals. The definition will start with all near Basin (resort triangle) projects and will be refined in the future...TRPA and Placer will [be] discussing for future environmental documents...how in Basin impacts from adjacent and very near to the Basin projects can affect internal assumptions and the environmental impacts within the Basin that need to be examined in that contexts." (Excerpts from minutes for 10/28/2015 GB hearing at http://www.trpa.org/wp-content/uploads/December-16-2015-Governing-Board-Packet.pdf).

[26] http://tahoempo.org/rtp_draft/1_Regional_Transportation_Plan_EIS/04_Cumulative_RTP.pdf

[27] http://www.placer.ca.gov/~/media/cdr/ecs/eir/tahoebasincp/deir/appendix%20g_transportation%20and%20circulation_revised%206_2.pdf?la=en

[28] Labeled as 03-11 in the FEIR, p. 3.2.4-106 to -107.



- Attractions. Attendance at several different attractions was also queried on the survey. The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there. Somewhat less popular but still important drivers of the visitor experience were Tahoe City Commons Beach (40 percent) and Kings Beach (33 percent). Somewhat less popular were the Squaw Valley tram (25 percent), Sugar Pine Point state park (23 percent), and Truckee River Rafting (16 percent).

The FEIR response refers to the Master Response regarding traffic impacts in the Tahoe Basin, which then fails to respond to the question. The public has not been provided the information used to assess where guests and employees are expected to drive in the Lake Tahoe Basin. Although Appendix C provides estimates of locations and associated VMT, the assumptions used to generate the trip data are still not provided. As noted, the estimated guest trips into the Tahoe Basin, including on SR 89 along the West Shore, appear to significantly underestimate trips based on the information presented in the North Lake Tahoe Resort Association's 2014 survey of traveler destinations.

Given the project is anticipated to contribute to cumulative traffic impacts in the Lake Tahoe Basin to a degree that will violate the VMT standard, it is reasonable to assume that the project will further contribute to the cumulative impacts of traffic from multiple regional projects and plans. The FEIR should fully disclose this impact.

IV. Inadequate Mitigation:

CEQA section § 21002.1 states: "(a) The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. (b) Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." [Emphasis added].

While the FEIR makes references to the 2016 TART Systems Update Plan[29] (p. 32), the proposed mitigation provides no guarantees that transit service will be expanded to mitigate impacts, no performance measures that must be met by future mitigation, nor does proposed mitigation go far enough to further mitigate impacts. Instead, the applicant simply deems the impacts 'significant and unavoidable' and asks you to approve their project with 'Overriding Considerations."

As noted in our comments on the DEIR, the mitigation measures are insufficient, and the FEIR: *"needs to include provisions which clearly identify when ridership will be considered to have reached capacity, and therefore, when this mitigation measure would be required. In addition, the FEIR needs to analyze the existing transit service, and changes to frequency, cost, convenience, destinations, and other factors that will be necessary to increase ridership, and what monitoring activities will be included to ensure sufficient transit service in the future. Further, the FEIR needs to identify measures to disincentivize personal automobile use, and how such measures will be implemented and monitored over time."* (p. 14 in FOWS DEIR comments; labeled as comment O3-13 by FEIR).

O11-6

A. Ridership capacity undefined:

Our comments labeled O3-13 express concerns regarding Mitigation Measure 9-7, which requires the applicant to pay a fair share toward transit funding - but only after ridership approaches capacity. However, "capacity" is not defined, nor is there any analysis of how, or if, this funding will actually mitigate project impacts. The FEIR acknowledges that this information will need to be further developed,[30] and states that the determination of the specifics of this mitigation will be done later in consultation with TART and Placer County Staff.[31] However, this response defers mitigation and fails to provide the public with the detailed information necessary to assess the project impacts and future requirements. The public cannot possibly comment on details that are not provided in the first place.

B. Future transit service:

The FEIR fails to address the inadequacies in mitigation from transit service. In addition to the defects noted above, the response provided in the Master Response 3.1.2 includes other contradictory statements and insufficient information.

[29] "The annual funding is designated for the ongoing operational and maintenance costs for transit services outlined in the Tahoe Truckee Area Regional Transit Systems Plan and to pay the TART fares for Specific Plan employees." (p. 32). April 6, 2016.

[30] "With regard to triggers that result in new transit service and what factors will be used to determine when ridership approaches capacity, it is acknowledged that this type of detail will need to be further developed; however, the DEIR incudes commitments to meet the performance metrics to be established by TART." (FEIR response to O3-13, p. 3.2.4-120).

[31] "The comment indicates that mitigation for impacts to transit service should include monitoring and a definition of what it means for ridership to be at capacity. As described in the DEIR, pursuant to Mitigation Measure 9-7, the provisions for monitoring and determining the appropriate fair share or the steps for forming a CSA or CFD shall be determined prior to the recordation of the Initial Large Lot Final Map in consultation with, and to the satisfaction of, Tahoe Area Regional Transit (TART) and County staff." (FEIR response to O3-12, p. 3.2.4-120).

1) The FEIR suggests that the VSVSP's anticipated fair share funding will cover just one additional inbound bus from Tahoe City and one from Truckee during a Saturday winter morning peak hour, estimated to reduce 37 trips.[32] However, the FEIR does not disclose whether a reduction of 37 trips will provide sufficient mitigation for the project's impacts. During the summertime, the DEIR estimates almost 600 new trips may occur on a peak Friday in the summer (Table 9-19[33]), however no performance standards or estimates are provided for how many trips will be reduced through transit improvements.
2) Oddly, even as the FEIR relies on improved transit service as one means to mitigate project impacts, the FEIR also suggests that enhanced transit service may not be an effective means to reduce auto use.[34] The FEIR also responds to our DEIR comments regarding the need to consider additional disincentives to personal automobile use by admitting, "*the VSVSP does not include any features that would directly dis-incentivize private automobile use in the region.*" (FEIR, p. 3.2.4-120). Even as this impact is recognized as significant and unavoidable in the FEIR, no consideration of such disincentives that may provide additional mitigation options is provided. Further, there is no evaluation of what types of transit improvements would improve ridership, such as reduced wait times, different/additional locations, lower fees, etc.

Measures involving targeted improvements to transit service[35] combined with disincentives to personal automobile use provide two clear examples of additional mitigation measures that the project could incorporate to help mitigate traffic impacts. In addition, the EIR needs to include performance standards upon which mitigation measures can be monitored and assessed. We herein incorporate detailed comments regarding mitigation from the League to Save Lake Tahoe, Sierra Watch, Mountain Area Preservation, and the Friends of Squaw Valley.

In summary, the EIR contains deferred mitigation in the form of additional transit service that will be determined later (outside of the EIR's public process), with suggestions that such mitigation may reduce just a small portion of the additional peak hourly trips in the winter, followed by references to a study that indicate such transit increases may not, alone, be effective to mitigate traffic impacts. The EIR also ignores additional mitigation measures that

[32] "One evaluation of the VSVSP's anticipated fair share funding contribution indicates that it would be sufficient to provide one additional inbound bus arriving from Tahoe City and one additional bus arriving from Truckee during the Saturday Winter AM peak hour (with a comparable reverse afternoon trip). It is estimated, based on a review by the EIR traffic engineer, that this would result in the removal of 37 peak hour, peak-direction project-related vehicle trips that would otherwise drive to the Village (based on the bus capacity, and average vehicle occupancies of employees and skiers)." (FEIR, p. 3-27)

[33] "Table 9-19 displays the number of new vehicle trips generated by the proposed project during the summer Friday p.m. peak hour. As shown, the project would generate approximately 590 trips during this peak hour." (DEIR, p. 9-42).

[34] "As a result, skiers with ready access to a private vehicle have little incentive (in terms of monetary or time savings) to use a transit service, given the time needed to wait for the bus or use a park-and-ride. ...Overall, however, the results of this experimental service indicate that simply providing enhance transit service to park-and-ride locations in the North Tahoe/Truckee region is not an effective means of reducing auto use." (FEIR, p. 3-27 and 3-28).

[35] Which have been well outlined in the TART 2016 Systems Update Report.

are available even as it concludes significant and 'unavoidable' impacts. Clearly this defeats CEQA's requirements for an EIR to inform the public and to include all feasible mitigation measures – especially where impacts have been determined to be significant and unavoidable.

V. Conclusion:

It appears that rather than address the DEIR's technical insufficiencies and evaluate all available mitigation measures, the developers aim to wash their hands of the impacts by simply reasserting the (inadequate/undefined) "mitigation measures" provided in the DEIR and then stating that more can't be done, thereby leaving it to the you and the Board of Supervisors to decide if the traffic impacts are worth the project's purported benefits. We do not believe Lake Tahoe owes the applicant a profit at the Lake's expense, nor should public safety be further compromised for the applicant's bottom line.

We ask you to deny this project as proposed, and ensure that if/when a revised alternative is provided, a smaller-sized project is considered, and adequate analyses of impacts and requirements to employ all feasible mitigation options are incorporated

011

Friends of the West Shore
Susan Gearhart, President and Jennifer Quashnick, Conservation Consultant
August 7, 2016

011-1 The comment states that the FEIR does not address the commenter's concerns and questions regarding the DEIR's analysis of impacts to the Tahoe Basin. A summary of concerns is presented, including concerns related to traffic, emergency access and evacuation routes, and air and water pollution. See responses to comments 011-2 through 011-8, below, for detailed responses to these comments.

The remainder of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR or FEIR. Therefore, no further response is provided here. The Placer County Board of Supervisors will consider this issue during project deliberations.

011-2 See the Master Response in this document regarding project-generated Vehicle Miles Traveled (VMT) in the Tahoe Basin. Response to comment letter L2 in this document addresses emergency access to Olympic Valley. The issue of emergency access in the Lake Tahoe Basin was not raised by any commenters (including emergency responders) during the DEIR comment period. The proposed project would result in a significant and unavoidable impact to traffic on State Route (SR) 28, east of SR 89 by adding 160 vehicles during the Summer Friday peak hour to a segment of roadway already operating at congested levels; as shown in Table 9-23 of the DEIR, peak traffic at this time would be 1,559 vehicles without the project and 1,719 with the project. In addition, see response to comment 03-1 in this document regarding the Fanny Bridge Revitalization Project. Improvements to Fanny Bridge were not assumed in the FEIR. No other significant impacts to traffic in the Basin would result. The project's addition of traffic to this congested area, an equivalent of less than 3 vehicles per minute, would be unlikely to meaningfully affect the ability of emergency responders to provide services; further, this area of roadway has a center median (painted yellow lines accessible for left turns) that would provide additional access in the event of an emergency. Similarly, an increase of 3 vehicles per minute would not meaningfully affect evacuation.

011-3 See the Master Response in this FEIR regarding project-generated VMT in the Tahoe Basin. This response also addresses air quality impacts within the Lake Tahoe Air Basin. The project, along with cumulative development would result in a total VMT that is below the TRPA's carrying capacity for air quality.

011-4 See response to comment 03-1 in this document regarding the Fanny Bridge Revitalization Project. Improvements to Fanny Bridge were not assumed in the FEIR.

011-5 The comment states that the FEIR does not respond to the Friends of the West Shore's comments regarding the evaluation of how climate change will affect the project's cumulative impacts. Climate change is addressed in the DEIR in Chapter 16, "Greenhouse Gases and Climate Change," and in the FEIR Master Response regarding greenhouse gas impacts (which contribute to climate change impacts). Cumulative impacts are addressed in the DEIR in Section 18.1, "Cumulative Impacts," and in the FEIR Master Response regarding the cumulative analysis. The commenter also mentions climate change impacts on the evacuation of people from the area, which is addressed in response to comment letter L2 in this document, and changes in weather and snowpack affecting water supply, which is addressed in the FEIR (see Section 2.2, "Updated Water Supply Assessment and Groundwater Data," as well as responses to comments 02-57 and 09-140 through 09-165).

011-6 See the Master Response in this document regarding project-generated VMT in the Tahoe Basin, including consideration of the projects listed by the commenter. Regarding other cumulative impacts, see pages 18-1 through 18-57 of the DEIR for an analysis of the cumulative impacts of the VSVSP with other related projects.

011-7 See the Master Response in this document regarding project-generated VMT in the Tahoe Basin. Regarding the comment about guest trips along the West Shore, the DEIR included a trip distribution analysis (see Exhibit 9-8) which shows 16% of peak summer traffic from the project traveling south from the SR 89/SR 28 intersection, which is the direction of the West Shore. As shown in Table 9-23, this equates to 45 vehicles. No significant impacts would be expected at the intersection of SR 89/SR 28 in this direction with project traffic, and this is the most congested intersection in the Basin that would be accessed by substantial project traffic. Based on this, there is no expectation that traffic impacts would occur to the south, along the West Shore, especially as traffic disperses along this route.

011-8 This comment reiterates comments provided on the DEIR and responded to in the FEIR (see response to comment 03-13) regarding the adequacy of traffic mitigation. In response to the FEIR responses, the comment suggests that the EIR contains deferred mitigation in the form of additional transit service and ignores additional mitigation measures. Specifically, this comment suggests that the updated Mitigation Measure 9-7a as described in the FEIR lacks detail to understand how it could truly be considered as mitigation. The comment also cites the need for a definition of "capacity," and a discussion of how or if this funding will actually mitigate project impacts. Refer to responses to comments S1-7 and 02-4 in this document. See also responses to comment letters from the League to Save Lake Tahoe (02 and 03), Sierra Watch (06 and 07), Mountain Area Preservation (04), and the Friends of Squaw Valley (09 and 010) in this document that address the issue of traffic mitigation, including transit service.

In its conclusion section, the comment suggests that the DEIR contains technical insufficiencies and does not evaluate all available mitigation measures. See responses to comments 011-1 through 011-7, above, for detailed responses to the detailed comments in this letter. Regarding the comment about deciding whether the project's traffic impacts are worth the project's benefits, see the portion of response to comment 010-6 in this document regarding balancing the project's impacts and benefits.

Finally, the comment states that the Planning Commission and Board of Supervisors should deny the project as proposed and consider a smaller-sized project, ensuring an adequate analysis of impacts and use of all feasible mitigation options. This portion of comment is reflective of the commenter's opinion of the project and does not raise specific issues so no response is provided.

I1

1

Date: May 26, 2016
To: Placer County Community Development Resources Agency, Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
Attention: Maywan Krach
cdraecs@placer.ca.gov
From: Judy Carini
PO Box 2419
Olympic Valley, CA 96146
squawhouse@att.net

RE: Response to 'Response to Comments on the Draft EIR

I am not a planner or a lawyer and I don't know the proper response procedures. My opinions are based on my experiences and observations having lived in Squaw Valley, on Squaw Valley Road, for over 40 years. According to Ascent Environmental, my responses to the DEIR, dated July 16, 2015, 'did not address the content, analysis, or conclusions in the DEIR'. So, let's see if my replies to the 'Responses to Comments on the Draft EIR' gain more respect. After reading the FEIR, my thought was that no one has really read the SVGPLUO. They have only jumped from part to part looking for specific wording to cover whatever they were working on If they had taken the time to really read it they would realize that a full buildout was not envisioned by the authors, who, I might add, included Placer County. Why does the County spend the money to draft General Plans and Community Plans is they have no intention of complying with those documents?

154-2 and 154-28

At the SVMAC meeting May 14, 2016, Chevis said that the Specific Plan would basically replace our Squaw Valley General Plan.

I1-1

The 1983 Squaw Valley General Plan and Land Use Ordinance states: "Sound conservation and development practices as stated or implied in the Placer County General Plan and which this plan accepts as planning principles, require that the following guidelines be followed in the future development of Squaw Valley"

> Both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological and environmental assets of Squaw Valley. Both the quality and quantity are in question with this project. The Specific Plan offers no guarantee as to the quality because no development plans have been produced and no quality specifications are included.
>
> Future development in Squaw Valley should occur only where public facilities and services, including transportation, can be efficiently provided. The one thing we do know for sure is that there are transportation impacts that cannot be ignored or mitigated. The current Specific Plan does not provide a solution to the traffic problems. This is not acceptable. If a solution cannot be found then the project should be denied.
>
> In planning for the future growth and development of Squaw Valley, an optimum balance of activities and facilities, which recognizes the strengths, weaknesses and inter-relationships of various segments of the Truckee-Squaw Valley and Tahoe area economy, should be encouraged." This condition has been completely ignored in the Specific Plan. The MAC does not fit into the SVGPLUO plan for future recreation.

I1-2

The 1983 SVGP states: "To develop this potential, this Plan proposes an integrated and balanced set of policies and standards for land development. The plan allows growth in Squaw Valley to reach a seasonal-peak, overnight residential population of about 11-12,000; maximum skier capacity would be 17,500 people per day." Population figures in the DEIR, the WSA and the SP are incorrect. The 2010 Census should not have been used to determine peak population in Squaw because it clearly admits

2

that 'visitors, both day and overnight, are not accounted for in the Census, and no assessment of this transient component of effective population has been completed.' Placer County provided inaccurate information to Ascent Environmental on both average and peak population by concluding that all the single family residences and multi-family residences in Squaw are 1 bedroom units with 2.1 persons per unit. This is far from accurate. There are few, if any 1 bedroom single family residences and few if any 1 bedroom multi-family residences. Using this false information gave an estimated peak overnight population of 9,483. If this group were calculated with at least 2 bedrooms per unit and 2 persons per bedroom, which is still estimating low, the estimated peak overnight population would be 11,453. The EIR should be revised to reflect the higher, more accurate number. Doing so would mean that other impacts will have to be readjusted to accommodate this higher calculation, including the traffic, making that impact much more critical. It will also mean that future planned developments cannot be approved because, if the Specific Plan is approved, the Valley has reached its peak allowable population.

I1-2 (cont.)

The1983 SVGP states: "Within the existing residential subdivision there are currently in excess of 100 illegal apartments." This statement further proves that the estimated population figures used in the DEIR and EIR are incorrect and this statement also calls into question the amount of employee housing needed. Placer County and Ascent Environmental has failed to provide accurate information on peak population, average population and available employee housing in the Valley. A new study is needed for this category.

I4-3

154-19, 154-20 and 154-21

The 1983 SVGP states: "One basic assumption of this 1983 Plan is that no additional routes into the Valley will be constructed. This causes the traffic capacity of the intersection of State Highway 89 and Squaw Valley Road to be a limiting factor to development in the Valley." "the level of service during peak hours will fall below an acceptable "C" level before even half of presently allowable development has occurred. Build-out of either of the following would result in undesirable levels of service:

a) Approximately 1700 additional occupied residential units, or
b) Approximately 500,000 square feet of additional commercial gross floor area

In the 1983 SVGP, it was estimated that in 1983 there was 122,110 sq. ft. of commercial space and in 1972 there were 2800 residences. The SP proposes to allow up to 1493 bedrooms plus 300 beds, plus 297,733 square feet of commercial. No calculation has been provided in the DEIR giving the current commercial square footage, and no calculation has been provided showing the number of units that have been added since the 1983 SVGP. This condition in the SVGP is being ignored. It is the job of the DEIR to identify and provide this basic information and to follow the terms and conditions of the 1983 SVGP.

I4-4

If information becomes available prior to the release of a FEIR, it only makes sense that the new information should be incorporated into the report. This is the case with traffic and parking in Squaw. The 2015/2016 ski season should be an eye opener for Placer County, KSL and Ascent Environmental, and this new information should be incorporated into the FEIR. This ski season has also proven to all who are paying attention that traffic and parking problems in Squaw and neighboring communities are far more impacting than just a handful of days. There were over 25 days that have been identified as peak, with coning necessary and over-flow parking situations common. The skiers started showing up around December 19th, and continued to come, week in and week out.

The traffic delays that day skiers face getting to and from Squaw are terrible. It is irresponsible for Placer County to approve a project with a terrible traffic situation and no way to solve or improve it.

I4-5

Where will the day skiers park their cars in order to conveniently access the busses?
How many busses will be needed to really make a dent in the morning traffic congestion?
Is it realistic to expect that most day skiers will use the busses?
Will the busses really be able to get the skiers to the mountain faster?
Will the parking structures proposed for Squaw really accommodate all the cars?

3

KSL has also talked about charging for parking as a way to discourage day skiers from driving their car to Squaw, and closing the road when the parking lot is full is also on the table. This plan has flaws. For instance, if day skiers buy their tickets in advance, and then find themselves unable to get into Squaw, what then? These are not workable solutions.

Every existing parking space in Squaw is needed, and more. There have been a number of days this season where every possible parking spot has been filled, but on February 20th, the cars were parked anywhere they could fit, whether legally or not, including down Squaw Valley Road past the entrance to the Stables.

KSL has theorized that cars leave the parking lot during the day and other cars can come in and fill those spots. Assuming that some skiers do leave from time to time during the day, without a helicopter or a drone hovering over the parking lot spotting the available open spaces, how does that late coming day skier find that open space.

KSL plans to take up a substantial area in the parking lot for their indoor water and adventure facility. This would, if built, create an even bigger parking problem. This is a ski area and parking for skiers should be top priority and not sacrificed for an un-needed and inappropriate water park.

I-2-9

This ski year is challenging all the theories, assumptions and ideas that have been proposed. Placer County and KSL need to put a plan together that incorporates all traffic control measures, including coning, a traffic control workforce and bussing. And, not just in Squaw, but also in Truckee, on Highway 89 and in Tahoe City. This plan should be included in the final EIR.

In conclusion:

The SVGPLUO talks about development, but it also talks about protecting the unique resources of the Squaw Valley area. "The **letter of the law** versus the **spirit of the law** is an idiomatic antithesis. When one obeys the letter of the law but not the spirit, one is obeying the literal interpretation of the words (the "letter") of the law, but not necessarily the *intent* of those who wrote the law. Conversely, when one obeys the spirit of the law but not the letter, one is doing what the authors of the law intended, though not necessarily adhering to the literal wording."

"Law" originally referred to legislative statute, but in the idiom may refer to any kind of rule. Intentionally following the letter of the law but not the spirit may be accomplished through exploiting technicalities, loopholes, and ambiguous language.

Many of the over 300 letter opposing the KSL Specific Plan talked about the spirit or character of Squaw Valley and how it would be lost if the Specific Plan were to be approved. Ascent Environmental did not respond to or address the loss of the "Spirit of Squaw Valley" and they failed to consider what the authors of the SVGPLUO intended.

Has the EIR followed the recommendation, conclusions and intent of the 1983 SVGPLUO, or has it simply addressed the Specific Plan on its content, analysis and conclusions? I think the 1983 SVGP has been ignored and the community has been given a final EIR that is bias toward the developer. Ascent Environmental needs to step up and follow not only the letter of the SVGP, but almost more importantly, the intent.

The Final EIR cannot be approved based on inaccurate population data. Please see the included information below supporting my comments.

Thank you,

Judy Carini

4

Analysis of Placer County Occupancy Data

Olympic Valley Estimated Peak Overnight Population, by Alex Fisch, Placer County Planner:

Explanation of Chart: Alex studied both the managed (rented) and the unmanaged (not rented) units/bedrooms and he divided his study into four parts. The managed bedrooms were calculated at 1.6 persons per bedroom and the unmanaged were calculated at 2.0 persons per bedroom. OVI, Red Wolf Lodge and Plumpjack were calculated at 4.0 persons per bedroom. Those figures were then multiplied by 1.31. The Single Family and Multi-Family Residences were calculated at 2.1 persons per household, indicating that each household had only 1 bedroom. **The Village at Squaw Valley Draft EIR states:** "The peak population of existing single- and multi-family residences is estimated to be 2,178, based on the number of units reported in the 2010 U.S. Census, plus construction permits issued between June 2010 and February 5, 2014 (1,037 total units), and assuming 2.1 persons per household. This is a conservative estimate of existing peak overnight population that assumes all available units are 100 percent occupied. Actual overnight peak occupancies are unknown."

A census is not in any real way designed to answer the question of peak occupancy. It is designed to count households and residents, not transients. Using the 2010 U.S. Census to determine the peak overnight population in Squaw Valley is not an appropriate source of data. The population conclusions from Alex's study are unreasonable, far from reality, and should not be used. Below is Alex's study.

		Units	Bedrooms	Beds	Predicted overnight Peak Population
Table 1:	Proposed Condo Hotel Lodging Units				
	VSVSP	850	1493		3,325
	East Parcel	Unknown		300	
Table 2:	Existing Condo Hotel Lodging Units				
	Intrawest Village	309	454		1,095
	Resort at Squaw Creek	405	405		873
	Squaw Valley Lodge	218	327		789
Table 3:	Timeshare Lodging Units and Hotel Lodging Units				
	Olympic Village Inn	90	90		472
	Red Wolf Lodge	32	32		168
	Plumpjack Squaw Valley Inn	56	56		283
Table 4:	Single Family and Multi-Family Residences				
	Olympic Valley	1037	1037		2,178
	Sub Total:	2,997	3,894		9,183
	East Parcel Beds Counted with 1 person per bed			300	300
	Alex's Estimated Peak Overnight Population:				9,483
Table 4:	Revised to represent 2 bedrooms per unit with 2 persons per bedroom:	1037	2074		4148

This revised version of Alex's numbers gives a more realistic total estimated Peak Overnight Population of: 11,453

5

Below is a comparison between Alex Fisch's calculations and Judy Carini's calculations. For this comparison, Carini has lowered her bedroom numbers to 2.0 per condos and 2.5 per residences with 2.0 persons per bedroom. This does not represent Carini's actual estimated peak overnight population, which is included at the end of this letter.

	Alex Fisch See Explanation Above			Judy Carini @ 2.0 and 2.5 Bedroom and 2.0 Persons Per Bedroom		
	Units	Bedrooms	Population	Units	Bedrooms	Population
VSVSP	850	1493	3325	850	1493	2986
Intrawest Village	309	454	1095	296	658	1316
Resort at Squaw Creek	405	405	873	405	607	1214
Squaw Valley Lodge	218	327	789	210	420	840
OVI	90	90	472	90	90	180
Red Wolf Lodge	32	32	168	32	68	136
Plumpjack Squaw Valley Inn	56	56	283	56	70	140
Olympic Valley	1037	1037	2178	1054	2635	5270
	2997	3894	9183	2993	7156	12,082
East Parcel:			300			300
Totals:			9483			12,382

Source: U.S Census, 2010, Placer County, The Neighborhood Company, Village at Squaw Valley Specific Plan Water Supply Assessment, Squaw Valley Public Service District, 2014

Source: U.S Census, 2010 and Placer County, 2014	Single Family and Multi Family Residential Units	**1037**
Timeshare Lodging Units and Hotel Lodging Units	Olympic Village Inn (90), Red Wolf Lodge (32), Plumpjack SV Inn (56)	**178**
Existing Condo Hotel Lodging Bedrooms	Intrawest Village (454 bedrooms), Resort at Squaw Creek (405 bedrooms), Squaw Valley Lodge (327 bedrooms)	**1186**
	Total Units	**2401**

Study of the Valley Occupancy Data from 2008 to 2014, along with the Valley Occupancy Monthly Summary, the Annual Averages and the Annual Averages by Property Type, prepared by Alex Fisch, Placer County Planner:

A. Here are the specific hotels that were studied.

1. The Village at Squaw Valley USA
2. Resort at Squaw Creek
3. Squaw Valley Lodge
4. Plumpjack Squaw Valley Inn
5. Olympic Village Inn
6. Red Wolf Lodge

6

B. Below is a breakdown of the study on units sold (rented) between January 1, 2008 and December 31, 2014, which shows that more than 727 days of that period were not included in the study. This equates to almost 30% of the days in the study. Some of those days were high rental days like New Year's week and Thanksgiving week. This is a substantial omission.

		Holidays missing from data	
1.	January 1 through January 6, 2008 (All Hotels)(6X6=36)	36 days	New Years Week
2.	October 20 through October 31, 2008 (All Hotels) (6X12=72)	72 days	Thanksgiving
3.	November 1 through November 2, 2008 (All Hotels) (6X2=12)	12 days	
4.	May 18 through May 31, 2009 (All Hotels) (6X14=84)	84 days	Memorial Day
5.	November 23 through November 29, 2009 (Squaw Valley Lodge)	7 days	Thanksgiving
6.	November 3 through November 30, 2009 (Plumpjack)	28 days	Thanksgiving
7.	November 1 through November 15, 2009 (Red Wolf Lodge)	15 days	
8.	April 5 through April 11, 2010 (All Hotels) (6X7=42)	42 days	
9.	May 17 through May 31, 2010 (Red Wolf Lodge)	15 days	Memorial Day
10.	June 7 through June 13, 2010 (All Hotels) (6X7=42)	42 days	
11.	July 12 through July 18, 2010 (All Hotels) (6X7=42)	42 days	
12.	November 7 through November 18, 2010 (Resort at Squaw Creek)	12 days	
13.	November 7 through November 30, 2010 (Plumpjack)	24 days	Thanksgiving
14.	November 14 through November 21, 2011 (Resort at Squaw Creek)	8 days	
15.	November 14 through November 30, 2011 (Plumpjack)	17 days	Thanksgiving
16.	April 20 through April 27, 2012 (Squaw Valley Lodge)	8 days	
17.	May 28 through May 31, 2012 (Squaw Valley Lodge)	4 days	Memorial Day
18.	July 2 through July 10, 2012 (Squaw Valley Lodge)	9 days	Fourth of July
19.	November 12 through November 20, 2012 (Resort at Squaw Creek)	9 days	
20.	November 6 through November 30, 2012 (Plumpjack)	25 days	Thanksgiving
21.	May 12 through May 18, 2013 (Plumpjack)	7 days	
22.	July 15 through July 24, 2013 (Squaw Valley Lodge)	10 days	
23.	November 4 through November 30, 2013 (Resort at Squaw Creek)	27 days	Thanksgiving
24.	November 4 through November 30, 2013 (Plumpjack)	27 days	Thanksgiving
25.	December 30 through December 31, 2013 (All Hotels) (6X2=12)	12 days	New Year's Week
26.	January 1 through January 5, 2014 (All except for Red Wolf Lodge)(5X5=25)	25 days	New Year's Week
27.	November 9 through November 30, 2014 (Resort at Squaw Creek)	22 days	Thanksgiving
28.	November 24 through November 30, 2014 (Village at Squaw Valley, Squaw Valley Lodge, Olympic Village Inn, Red Wolf Lodge) (4X7=28)	28 days	Thanksgiving
29.	November 4 through November 30, 2014 (Plumpjack)	27 days	Thanksgiving
30.	December 1 through December 9, 2014 (Resort at Squaw Creek)	9 days	
31.	December 1 through December 7, 2014 (Olympic Village Inn)	7 days	
32.	December 29 through December 31, 2014 (All except Red Wolf Lodge)(5X3=15)	15 days	New Year's Week
	Total of Missing data:	727 days	

7

The properties below advertise on the internet that a studio can sleep up to 4 people, a 1 bedroom unit can sleep from 2 to 6 people, and some units sleep as many as 8 people. This information supports a higher peak overnight population than is calculated by Alex Fisch, Placer County Planner.

Red Wolf Lodge

32 units/all have sofa beds
studios sleep 4
1 bedrooms sleep 4-6
2 bedrooms sleep 6-8

Plumpjack Squaw Valley Inn

double queen
king
superior king
superior double
double
room - 1 king
superior room - 1 king

Squaw Valley Lodge

1 bedroom suites sleep 2-4
deluxe studio suites sleep 2-4
premium 1 bedroom suites sleep 2-4
loft suites sleep 3-6
premium loft suites sleep 8
2 bedroom suites sleep 4-6
2 bedroom suites with twin beds sleep 4-6
3 bedroom suites sleep 6-8

Resort at Squaw Creek

deluxe rooms sleep 4
fireplace suites sleep up to 8
penthouse sleeps up to 8

Village at Squaw Valley has a variety of sized rooms and can sleep 7-8 people

8

Judy Carini - Source - On site count of the Squaw Valley Units and Bedrooms, Updated 5/1/2016

Existing properties, approved and active projects that will contribute to the Squaw Valley seasonal peak overnight population, calculated at 2 persons per bedroom	Existing, Active or Approved	Total Units	Bedrooms Per Unit - Units with 2 and 3 bedrooms averaged at 2.5 per unit	Total Bedrooms/ Actual and Averaged	Total sleeping areas with sofabeds	Estimated peak overnight population, condos calculated with 2 or 2.5 bedrooms plus sofabeds, homes calculated at 2.0 persons per bedroom and without apartments or sofabeds	Total Units per Group	Total Occupants/ persons per Group
Squaw Ridge Meadow Court Condos	Existing	16	2 and 3	40	56	96		
The Aspens	Existing	16	2 and 3	40	56	96		
Tavern Inn Condos	Existing	56	2 and 3	112	168	336		
Valley View Townhomes	Existing	22	2	44	66	132		
Christy Hill Condos	Existing	32	2	64	96	192		
Tram Condos	Existing	13	2	26	39	78		
Squaw Valley Meadows	Existing	36	2	72	108	216		
1800 Squaw Valley Road	Existing	16	2	32	48	96		
Squaw Valley View Condos	Existing	22	2 and 3	55	77	132	229	1374
Squaw Valley RE Building Units	Existing	4	1	4	4	8		
Squaw Valley Bear Pen Apartments	Existing	1	2	2	2	4		
SVPSD Firestation Lodging	Existing	1	4	4	4	4		
Squaw Valley Academy	Existing	2		25	25	90		
Christy Inn Lodge - Grahams	Existing	1	6	6	6	12		
Hostel	Existing	1	4	4	4	0		
Employee Housing behind OVI	Existing	6	2	9	8	18		
1920 Chamonix - Ski Corp Guest Apartments	Existing	4	2	8	8	16	20	152
Resort at Squaw Creek Phase 1	Existing	405	1 and 2	607	607	1214		
OVI	Existing	90	1	90	90	180		
Plumpjack	Existing	56	1	56	70	140		
Squaw Valley Lodge	Existing	210	Studio to 3	420	420	840		
Red Wolf Lodge	Existing	32	Studio to 2	36	68	136		
Village @ Squaw Valley - First Ascent	Existing	139	1 to 3+	266	266	532		
Village @ Squaw Valley - 22 Station	Existing	157	1 to 3+	392	392	784	1089	3826
445 Squaw Peak Road - Squaw West A & B	Existing	4	2+	10	10	20		
450 Squaw Peak Road	Existing	4	2+	10	10	20		
435 Squaw Peak Road	Existing	4	1	4	8	16		
440 Squaw Peak Road	Existing	35	1 and 2	52	52	104		
415 Squaw Peak Road - Squaw Creek Villas	Existing	27	2	54	54	108		
410 Squaw Peak Road - Avalanche Condos	Existing	17	2 and 3	42	42	84	91	352
Granite Chief Homesites	Existing	28	3	84	84	168		
Squaw Valley Homesites	Existing	274	3.5	959	959	1918		
Hidden Lake Homesites	Existing	38	4	152	152	304		
Painted Rock Homesites	Existing	42	4	168	168	336		
Forest Glen Homesites	Existing	208	4	832	832	1664		
Squaw Ridge Homesites	Existing	5	5	25	25	50		
Truckee River Homesites	Existing	22	3	66	66	132		
Olympic Estates Homesites	Existing	16	4	64	64	128		
Creekside Homesites	Existing	25	4	100	100	200		
Squaw Creek Homesites	Existing	48	4	192	192	384		
Squaw Summit Homesites	Existing	8	4	32	32	64	714	5348
Total Existing Peak Overnight population:		**2143**		**5260**	**5538**	**11052**	**2167**	**11244**
Village at Squaw Valley Specific Plan	Active	850	1 and 2	1493	1793	3286		
Resort at Squaw Creek Phase 2A	Approved	24	3	72	96	192		
Resort at Squaw Creek Phase 2B&C	Approved					Unknown	24	192
Plumpjack Project	Active	94	2 to 5	329	375	750		
Palisades at Squaw Project	Active	63	3,4 and 5	223	223	446	1031	4674
Potential Peak Overnight Population:		**3174**	**2.375**	**7377**	**8025**	**15726**	**3174**	**15918**

Alex Fisch - Olympic Valley estimated Peak Overnight Population - Source: U.S Census, 2010, Placer County, The Neighborhood Company, Village at Squaw Valley Specific Plan Water Supply Assessment, Squaw Valley Public Service

Source: U.S Census, 2010 and Placer County, 2014	Single Family and Multi Family Residential Units, calculated at 2.1 persons per household	1037	2178
Timeshare Lodging Units and Hotel Lodging Units	Olympic Village Inn (90), Red Wolf Lodge (32), Plumpjack SV Inn (56)	178	923
Existing Condo Hotel Lodging Bedrooms	Intrawest Village (454 bedrooms), Resort at Squaw Creek (405 bedrooms), Squaw Valley	1186	2757
Village at Squaw Valley Specific Plan	Proposed Condo Hotel Lodging Units, 1493	1493	3325
East Parcel			300
	Total Units	3894	9483

Source: EIR - The project includes up to 1,493 bedrooms associated with hotel and resort residential uses (condo hotel, timeshare, and fractional units) provided in up to 850 units, employee housing sufficient to accommodate up to 300 employees in a mix of dormitory and studio units, up to a maximum of approximately 297,733 square feet of commercial uses (this square footage includes hotel common areas and various "back of house" uses), a Village Core, restoration of Squaw Creek, forest recreation uses, conservation preserve uses, a Mountain Adventure Camp, and a transit center and parking facilities. The project will also involve extension of some infrastructure. The Specific Plan would be developed over an estimated 25-year buildout period, with some construction proposed to begin no earlier

Source: WSA - Placer County estimates that the current maximum overnight peak population of Olympic Valley is approximately 5,858 residents and guests, including existing single- and multi-family residences, as well as existing condo, timeshare, and hotel lodging units. This is a conservative estimate of existing peak overnight population that assumes all available units are 100 percent occupied. Actual overnight peak occupancies are unknown.

I1 Judy Carini
May 26, 2016

I1-1 The comment cites excerpts from the *Squaw Valley General Plan and Land Use Ordinance* (SVGPLUO) and states where the commenter believes the project is inconsistent with the SVGPLUO. This issue has been addressed in the DEIR (see Chapter 4, "Land Use and Forest Resources") and the FEIR (see the Master Response regarding the SVGPLUO). Also, see responses to comment letter O7 in this document.

With regard to the cited passage from the SVGPLUO that states, "Both the quality and quantity of development must be planned to conserve, protect, and enhance the aesthetic, ecological and environmental assets of Squaw Valley", the commenter states that the quality and quantity of development are in question and that the specific plan offers no guarantee of quality because no plans have been produced and no quality specifications are included.

The project is a specific plan, which is a set of land use policies and codes, much like the SVGPLUO, which would establish a framework to guide future development within the plan area. The quantity of development within the plan area would be reduced by as much as 50 percent or more when compared to what could be allowed under the SVGPLUO, but judgment on whether this amount of development would achieve consistency with this statement is somewhat subjective so no further response is offered on this portion of the comment. The commenter's statement that no quality specifications are included is incorrect. If approved, all development phases in the specific plan would be required to comply with the development standards and design guidelines, a highly detailed code and design policy document that would ensure high quality project designs that would be aesthetically pleasing and would integrate with the setting and existing nearby development. Furthermore, the project is primarily located on previously disturbed lands, principally parking lots, and would result in limited disturbance of undisturbed land. The project includes other program elements, such as a stream restoration plan, that would conserve and restore ecologic functions within the plan area.

With regard to the cited passage from the SVGPLUO that states, "Future development in Squaw Valley should occur only where public facilities and services, including transportation, can be efficiently provided", the commenter states that the traffic impacts of the project cannot be mitigated, that the specific plan does not provide a solution to traffic problems, and that for these reasons the project should be denied.

The commenter's statements that the traffic impacts from the project cannot be mitigated and that the specific plan does not provide a solution to traffic problems is a mischaracterization of the specific plan and the EIR findings. The specific plan includes a number of transportation policies, programs, and facility improvements to increase use of private and public mass transit, increase other forms of multimodal transportation such as walking and biking by creation of a walkable village with a full range of guest services, reduce reliance on private automobiles and increase private automobile occupancy rates. In addition to these specific plan policies and programs, the EIR includes numerous mitigation measures to construct improvements to the roadway network, to implement traffic management programs in order to reduce peak period traffic impacts, and to incrementally fund expansion of public transit services. Each of the mitigation measures would be feasible and effective, but not all impacts to transportation and circulation would be reduced to a less than significant level with the mitigation. In rendering a decision on this project, the Board of

Supervisors will consider these and other issues including the degree to which the specific plan would comply with the policies of the SVGPLUO.

With regard to the cited passage from the SVGPLUO that states, "In planning for the future growth and development of Squaw Valley, an optimum balance of activities and facilities, which recognizes the strengths, weaknesses and inter-relationships of various segments of the Truckee-Squaw Valley and Tahoe area economy, should be encouraged," the commenter states that this has been ignored in the specific plan and that the Mountain Adventure Camp does not fit into the SVGPLUO plan for future recreation. This comment expresses the commenter's opinion about the project overall and the Mountain Adventure Camp facility, but does not raise any specific issues pertaining to environmental impacts of the project or its consistency with the SVGPLUO, so no further response is provided.

I1-2 The commenter states that the population figures used in the DEIR, the Water Supply Assessment and the specific plan are incorrect. The commenter goes on to state that the 2010 U.S. Census should not have been used as a source of information to determine the number of residents staying overnight in single-family and multi-family residential units because the U.S. Census does not account for transient populations. The commenter states that the County's population estimate is incorrect because the analysis assumed that all single-family and multi-family units in Squaw Valley are one bedroom units with an average of 2.1 persons per bedroom. The commenter further asserts that because the peak overnight population estimate is incorrect other analyses in the EIR are also incorrect because the EIR underestimates the impacts.

For a detailed description of how the project occupancy assumptions were developed, which were utilized to model average day demand and peak day demand for water, sewer and other utilities please see the Occupancy Assumptions Master Response on page 3-66 of the FEIR. For a detailed description of how the peak overnight population estimate for Olympic Valley was determined, please see response PH-20 on page 3.2.6-81 of the FEIR.

The commenter is incorrect that the single-family and multi-family residential units were assumed to be one bedroom units. The portion of the analysis pertaining to peak population generated by single-family and multi-family units makes no assumptions about the number of bedrooms per unit. Instead, the analysis relies upon the 2010 U.S. Census figures to determine how many persons would occupy each residential unit (2.1 persons per unit) and how many units are in Olympic Valley (1,013). The number of units is then increased to 1,037 based on Placer County data on issuance of residential building permits. The Census counts persons per household and does not collect any information pertaining to persons per bedroom. As described in response PH-20, to calculate peak occupancy in exiting residences, it was assumed that 100 percent of the 1,037 units were occupied by the 2.1 persons per unit identified in the U.S. Census figures (2,178 persons).

Olympic Valley has a proportionately high percentage (over 50 percent) of single-family and multi-family residential units that are secondary homes and/or vacation homes. Other than the U.S. Census, which counts permanent residents in primary dwelling units, no data exists to determine how many persons would be staying overnight in a residential unit during a normal or peak occupancy period or whether the unit is occupied at all. Accordingly, the U.S. Census is the only reliable data source to estimate how many persons would be staying overnight in a residential unit. Please also see response to comment O7-3 in this document.

Occupancy calculations for the six major resort and hotel properties within Olympic Valley were supported by actual population counts from data sets provided by the Neighborhood Company. Those figures were used to determine a "peak factor" for peak visitation periods, and the peak factor was applied to all existing resort properties and to the project.

The commenter's assertion that other analyses in the EIR are underestimated because the peak overnight population is underestimated is incorrect. The calculation of peak overnight population has no bearing on any of the other analyses in the EIR. All quantitative analyses are based on measured data for existing conditions and/or the project such as traffic counts, calculated VMT, noise measurements, sewer demand, water demand, electrical demand, propane demand, and air quality and greenhouse gas emissions, while other analyses such as aesthetics are qualitative.

I1-3 The commenter states, "The Squaw Valley General Plan states: 'Within the existing subdivision there are currently in excess of 100 illegal apartments'." The commenter goes on to state that this statement from the 1983 Squaw Valley General Plan proves that the population figures used in the DEIR are incorrect and that this information also calls into question the amount of employee housing needed to serve the project.

For a detailed description of how the peak overnight population estimate for Olympic Valley was determined, please see response PH-20 on page 3.2.6-81 of the FEIR. The statement from the 1983 Squaw Valley General Plan that there are currently in excess of 100 illegal apartments in Squaw Valley provides no evidence to support or refute the 2010 U.S. Census data and other data sources used to develop the population estimate from the DEIR as the cited number of illegal apartments dates from 1983 and is not a current assessment of existing conditions. Moreover, the figure provides no indication as to whether illegal apartments, the status or existence of which is presently unknown, are occupied. Similarly, the comment provides no evidence to support or refute the calculated number of project generated employees, which is the basis for determining the number of employee units the project is required to provide.

I1-4 The comment identifies a statement in the 1983 general plan for Squaw Valley that assumes no additional routes would be constructed into Olympic Valley and that traffic would be a limiting factor for new development. The level of development at which traffic would become a limiting factor presumed in the 1983 general plan are provided for planning purposes, but are not intended to be thresholds above which additional projects should not be approved. In fact, immediately below the development figures cited in the comment as producing an undesirable level of service, the SVGPLUO discusses alternates to address the issue – including the Capital Improvements Plan included in the SVGPLUO itself (see pages 38 through 44).

Note also, that the level of development proposed is consistent with the SVGPLUO. As indicated on page 4-22 of the DEIR, "The SVGPLUO allows for development of a maximum of 3,754 bedrooms (up to 1,877 units) within the plan area.[1] The proposed project includes a maximum of 1,493 bedrooms (up to 850 units), within the plan area, which is less than half of the maximum development potential allowed by the SVGPLUO."

I1-5 The comment suggests that data and observations from the 2015-2016 ski season should have been described in the FEIR. See response to letter I4 for additional discussion on this topic.

The commenter asks questions pertaining to the location of day-use parking, overall parking supply, and the use of buses to transport day-use skiers. Appendix G of the DEIR contains a comprehensive parking demand and supply analysis. As is described in that study, an engineering analysis was conducted to calculate a supply of parking that can accommodate the 5th busiest day of a typical ski season.

[1] These numbers reflect a 25 percent density bonus applied to land zoned as Village Commercial for additional structured parking.

It is unclear from the comment what busses are being referenced; existing transit busses, any new transit services, shuttle or bus services within Olympic Valley, shuttle or bus services that extend beyond Olympic Valley, shuttles from the East Parcel, or something else. Therefore, answers to the questions related to busses cannot be provided.

The commenter also cites the amount of skier parking that occurred on Saturday, February 20, 2016. This day represented a scenario in which excellent snow conditions (particularly fresh powder after a mid-week storm), fully open terrain, good weekend weather, a holiday weekend, and a strong economy overlapped. On this day, Squaw Valley reported an attendance of over 15,000 skiers/boarders, which is the greatest single day attendance in the last five years, but less than the maximum skier capacity of 17,500 skiers listed in the SVGPLUO (page 5). Squaw reports that all available parking was full by 11:00 a.m., and motorists were being turned away. Parking and traffic conditions on that day were atypical, and shouldn't be considered as any type of baseline condition to analyze a proposed project or activity. A study based on this day would be analogous to determining what parking supply should be provided at a shopping center based on the demand that occurred on the single, busiest day after Thanksgiving over a five-year span. Land developments are not planned to provide parking for such irregular events because this would result in an oversupply of parking, and associated environmental effects, during the overwhelming majority of the year.

I1-6 The comment addresses various issues related to the availability of parking. There is currently the potential for someone who buys a lift ticket in advance to arrive at Squaw Valley and not find parking. Existing approaches to this scenario (e.g., rain checks) would continue to be implemented. See Response I1-5 above regarding parking during February 20, 2016 and the concept of addressing extreme peak day parking. Squaw Valley currently manages a parking situation where vehicles leave the lot and incoming vehicles are directed to the newly available parking spaces. There is no reason to expect that similar systems would not continue under the proposed project. The comment implies that the presence of the Mountain Adventure Camp would limit available parking to support skiing. See Response I1-5 above and the parking supply and demand analysis provided in Appendix G of the DEIR, as well as the Master Response related to the MAC in the FEIR (Section 3.1.12, Master Response: Mountain Adventure Camp). Various traffic control measures, including enhancements to the existing traffic control program, are provided in mitigation measures included in the DEIR, for example, mitigation measures for Impacts 9-1 and 9-2. Development and implementation of traffic control plans in Truckee, on Highway 89, and in Tahoe City is outside the scope of this individual project.

I 2

Kathi Heckert

From: Andrew Hays <squawllyhood@yahoo.com>
Sent: Wednesday, August 10, 2016 3:37 AM
To: Kathi Heckert
Subject: Squaw Village for planning commission

Members of the Planning Commission,
To be frank the number of concerns that I have about the pending village proposal at Squaw Valley cannot be summed up in one letter, or even two. It seems I could write a book for all the material that this project provides, the number of glaring concerns are plentiful, but I see a major detail seemingly overlooked, that must be addressed.
At present the parking lot is accessed by three main points. (Far East Rd., Village East Rd., Squaw Valley south Rd.)
Visitors can choose to enter the parking lot through any one of those access points. Once there, the parking lot is open, allowing the cars to disperse across the various rows. If you were to watch the present day parking lot fill up, you would witness visitors clustering around the access points to the resort and then the spaces filling in the gaps. It is in practice a very efficient parking lot. Parking lots are terrible wastes for real estate, but integral to skiing. I had a free ticket to NorthStar and wouldn't go, simply because of the parking hassle.
Under the proposed plan most of the parking would be housed in multi level decks. What seems to be unaddressed in the EIR is the effect of greatly reducing the efficiency of the parking system will have on traffic subsequently backing up further. The specific plan seems to indicate that access to those parking decks will be limited to two points at most. How will cars, entering single file into a built structure not create a far worse problem that already exists? How quickly will the traffic propagate behind cars maneuvering up a parking ramp? There just is no logical way to contend that the proposed parking structures will be of greater efficiency of flow, this will have a severely negative impact on a traffic situation that is already at its breaking point.
Much has been said about the traffic. I can attest as someone who skis Squaw on a daily basis that the traffic situation is completely untenable as is. The developer would like us to believe that the addition of new units would reduce the number of visitors driving into the valley. I contest this conclusion. One of the biggest contributors to weekend traffic is the Squaw Kids ski team program. These parents are local, or second home owners. They may share a ski lease with another family. They are a major portion of the morning traffic, and are not the sort of families that will be staying in the village, they will still be clogging the roads, rushing to get their kids to ski school on time.
Another major contributor to traffic on high volume days is locals. Since the advent of a value priced season pass the number of pass holders has increased dramatically. Squaw Valley is home to the best skiing in Tahoe, if it's a powder day, people will be skiing Squaw Valley. None of these people will be staying in the village.
Airbnb is a huge part of the rental market right now. It seems my entire street has a new identity every weekend depending on who shows up from where. For visitors, particularly youthful ones, this seems to be, for better or worse, mostly worse, the method of lodging. These people have become used to the freedom and amenities of a full house. They often share them in large groups, not simply for the economics, but for the social aspect. I'm not convinced these college aged kids that swarm my street every late Thursday night, are the sort of people presently in the market for a luxury condominium. I think the short term rental market will remain strong, and most of these visitors too will continue to drive to the mountain and contribute to the overall traffic.
The developer has provided little answers as to how this situation will be improved. They speak of contributing money towards a transportation fund. Writing checks is far easier than solutions, and a bus every half hour is no solution, They propose to "encourage" more people to use the airport shuttle by advertising it more. They've got a carpool parking area for those with large enough car to fit all their gear and four (4!) people. They can make Squaw Valley RD temporarily three lanes, but it can't make the mousehole in Truckee any wider once it begins to back up there. They've got no real answer.
Clearly they are not building on this scale to maintain the same number of visitors. They hope to draw people to stay in the village, as well as continuing to draw heavily from the surrounding areas. Within this proposal, in an effort to facilitate this, they have sacrificed valuable ease of parking, creating a system that will certainly exasperate an already intolerable situation. It has become unjust how one single entity, one business, can effect the mobility of an entire region. We cannot make this worse before we've found a way to make it better. Please, respect this community and deny this ill sighted proposal.

With Respect,

Andrew Hays
8755 River RD.
Truckee, Ca

I2-1
I2-2
I2-3
I2-4

I2 Andrew Hayes
August 10, 2016

I2-1 The comment expresses concerns about parking and states that the EIR does not address the effect of greatly reducing the efficiency of the existing parking system, which will result in traffic subsequently backing up further. This issue is addressed, in part, in the FEIR in the Master Response regarding traffic (see "Adequacy of Parking Supply"). Also, see Appendix G of the DEIR, which contains a comprehensive parking demand and supply analysis. Further, Policy CP-11 of the proposed Specific Plan requires the preparation of a Peak Day Parking and Transportation Management Plan that addresses parking and circulation for day skiers and others on peak use days (see page 9-33 of the DEIR). Although the comment contends that the new parking facilities could adversely affect traffic flow relative to existing conditions, the comment provides no evidence to support this assertion. The parking structures could have two entry points; however, each of these entry points could have multiple lanes. There are currently three vehicle bridges across Squaw Creek from Squaw Valley Road that provide access to the existing surface parking lot. The proposed project also includes three bridge crossings into the project site. Any one of these bridges could provide access to one, or both, of the Lot 11 and Lot 12 parking structures. These are also not the only parking locations available as part of the VSVSP. Parking will be available under many of the proposed buildings, at the East Parcel, and the existing preferred parking structure will remain. Therefore, there will be multiple parking opportunities, with multiple entry points. Although a majority of day skier parking spaces will be provided at Lots 11 and 12, not every car will be travelling to these lots to park. Parking management staff will also continue to guide and manage traffic. Around the globe parking structures are designed and managed for efficient vehicle entry and dispersal. There is no reason to believe that this would not also be the case for the VSVSP.

I2-2 The comment expresses concerns about existing traffic issues in the project area. Traffic is addressed in the DEIR (see Chapter 9, "Transportation and Circulation") and the FEIR (see the Master Response regarding traffic). Mitigation is recommended where applicable; however, some impacts were determined to be significant and unavoidable even after mitigation. The Placer County Planning Commission and Board of Supervisors will consider this issue during project deliberations.

Regarding the comment about Airbnb and the short-term rental market and other elements contributed to existing traffic patterns in the project area, the traffic analysis in the EIR included the collection of data on existing traffic volumes and patterns in the project area. The trip generators identified in the comment would be reflected in the existing conditions information in the EIR. The traffic analysis did not assume that any of these trips would be removed because of lodging provided by the proposed project. The EIR assumes that trips generated by the proposed project would be additive to those existing trips. Therefore, the question of whether any individuals generating traffic under existing conditions would purchase lodging included in the proposed project has no bearing on the impact analysis in the EIR.

I2-3 The comment expresses concerns about the adequacy of traffic mitigation included in the DEIR. As noted above, mitigation measures are recommended in the DEIR to reduce or avoid significant traffic impacts. Further, the FEIR provides additional discussion of the effectiveness of proposed mitigation measures (see the Master Response regarding traffic). The comment does not provide specifics as to why the traffic mitigation measures are perceived to be inadequate. Therefore, no further response can be provided.

I2-4 The comment provides a summary of detailed comments provided above. See responses to the detailed comments above regarding parking and traffic. The remainder of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR or FEIR. Therefore, no further response is provided here. The Placer County Board of Supervisors will consider this issue during project deliberations.

I 3

May 7, 2016

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Dear Sir/Madam:

As homeowners in Olympic Valley, we are again writing to you to ask you to reject the planned development at Squaw Valley.

We believe that the proposed development is simply too big and too disruptive and will create long term substantial negative impacts on the environment and the area.

We have reviewed the assumptions for occupancy assumed in the EIR and believe that they are flawed. Whereas there is much written about the need for the MAC to assure year-round occupancy and operations, there is not enough credit given to the impact of this year-round activity on the annual occupancy.

I3-1

The report states that the weighted average occupancy from 2008-2014 for the properties in the area is 50.4 percent. This base occupancy suffers from containing most years that are either associated with the Great Recession or record low snowfall. As a result, it is an inaccurately low starting point. The study then compares occupancy to other resorts, but none of them are driving distance from densely populated urban areas similar in size to the Bay Area except other resorts in the Lake Tahoe area that would also have been impacted by low snowfall. The study then concludes that "no local data suggest that occupancy above 55 percent would be reasonably expected."

In a resort community, even if there is high occupancy during the peak season, there is frequently low occupancy the rest of the year. For example, if the resort is 90% full for 6 months during peak season and 10% full for six months during the off-season, the average occupancy will be 50%. If the addition of the MAC and the other proposed attractions is supposed to increase off-peak occupancy, there is ample opportunity for the off peak occupancy to increase substantially, thus driving up the annual occupancy. In this example, if occupancy during the off season only increased to the annual average of 50%, the actual annual occupancy would rise to 70%. The approach of simply considering average annual occupancies without studying the potential occupancy impacts on a monthly basis is flawed.

Thus, we believe the occupancy analysis is flawed because:

1. It uses as its base years that were impacted by the Great Recession or low snowfall.

I3-1 (cont.)

2. It does not appear that any of the comparable occupancy analysis considered fully year round locations that are driving distance to a highly populated urban area similar in scale to the Bay Area.
3. It did not assume that significant increases in off-peak occupancy would occur, which does not seem logical, since this the very premise on which the need for much of the development is based. In essence, the addition of the many attractions would be expected to increase occupancy somewhat in the peak season and substantially in the off-season, as that is their very purpose and the reason behind the developer's investment in them.

If much higher occupancy is assumed, the already significant negative impacts of the proposed development will be even greater than considered in the report.

I3-2

We would also like to add that there are numerous unmitigated impacts which, in our view, do not justify the project. Whereas KSL is focused on finding ways to create value for its investors regardless of the impact on the area, we are trusting Placer County to make decisions that benefit Squaw Valley for the long term and preserve this beautiful natural environment for generations. Please do not be the group that permitted irreversible damage to occur. Please listen to, and respect, the enormous outpouring of opposition from the community.

Sincerely,

Howard DeBow
Dennis Markus

I3 Howard DeBow and Dennis Markus
May 7, 2016

I3-1 The comment states that the assumptions for occupancy used in the EIR are flawed. This issue is addressed in the FEIR in the Master Response regarding occupancy assumptions. The portion of the traffic Master Response related to the use of 2011-2012 ski season data to represent existing winter conditions also indirectly responds to the concept of using information that was collected during a period that is described as a low snowfall year. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided here.

I3-2 The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR or FEIR. Therefore, no further response is provided here. Regarding the project's significant and unavoidable impacts, these are identified in the DEIR and FEIR along with explanations as to why the impacts cannot be avoided (see Section 18.2 of the DEIR). Further, if the Placer County Board of Supervisors approves the project, it will also prepare findings and issue a statement of overriding conditions for all impacts identified as significant and unavoidable. This is a CEQA requirement and is explained on page 1-1 of the DEIR as an explanation of the specific economic, social, or other considerations that the lead agency's decision-makers believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; CCR Section 15093).

April 26, 2016

To: Placer County Community Development Resource Agency,
Environmental Coordination Services,
3091 County Center Drive, Suite 190,
Auburn, CA 95603

I 4

Re: Comment on Final EIR for Village at Squaw Valley Specific Plan

Despite the assertion of the Final EIR that the traffic study is fine as is, my contention is that the analysis is incorrect and the explanations given in Chapter 3 (pgs 3-28 to 3-30) are replete with errors. Because traffic is such a significant impact of the Village proposal, an error in its analysis affects everything.

Recall that CEQA requires that measurements of "traffic volume should represent the peak average winter ski conditions". The dEIR states, and the Final EIR confirms, "Traffic data from the 2011-2012 ski season was chosen as the most appropriate winter season data set for establishing the existing setting". However, from all existing data, the winter of 2011-2012 was anything but average

In analyzing traffic, it is also essential to consider when the snow falls, as opposed to just total snowfall. In a normal winter, the plentiful snowfall early in the season attracts large numbers of skiers for the holiday weeks &/or weekends, thus resulting in high traffic numbers. But if the early season does not pan out, and the snowfall comes later in the season (e.g."miracle March" &/or April), the weekend warriors come in smaller numbers, though the locals will still throng to the powder.

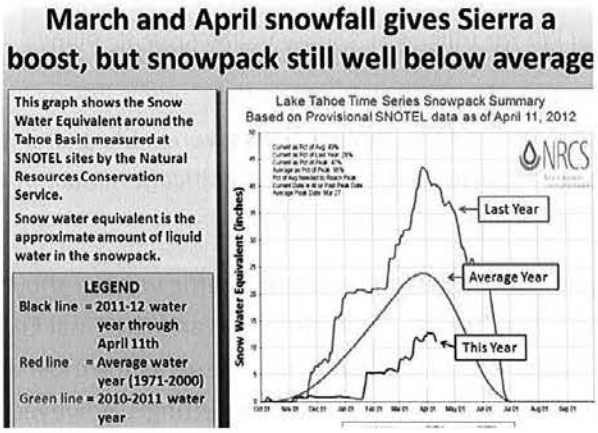
If you take this 2015-16 season as an example, the snowfall is close to average, but much fell early in the season and the crowds and traffic during the holidays were epic. While later weekends were still excellent, the numbers did not match the earlier holiday totals..

In this rebuttal, I will analyze the Final EIR Responses 1-7 in order to demonstrate that the traffic study is fundamentally flawed. I will first provide the basic assertion made in each of the response items, and then rebut them.

Response to Item #1: *"Snowfall data does not support an assertion that 2011 - 2012 was one of the driest in recent times".*

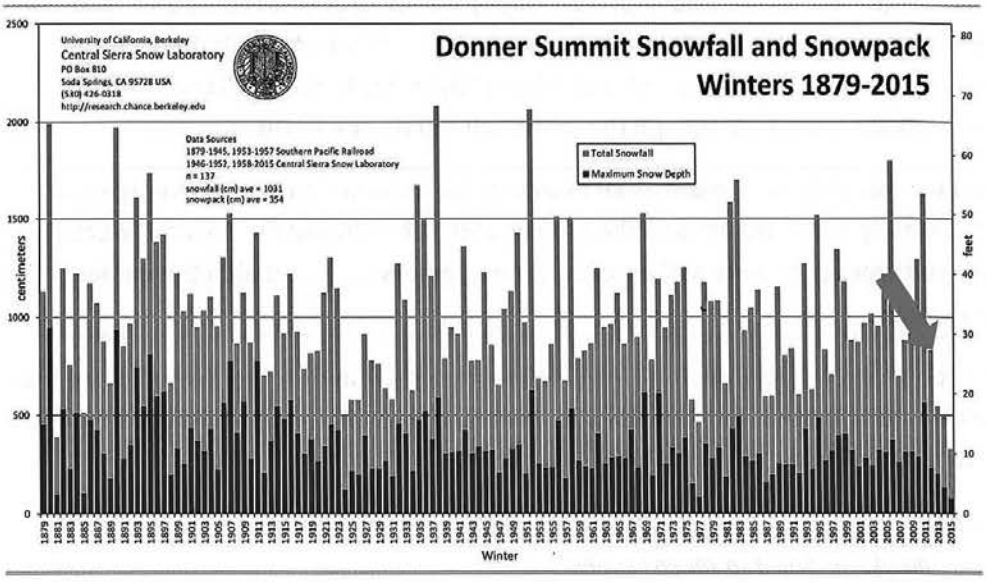
1

The Final EIR says that the total snowfall (reported at Squaw) was 394 inches. But, importantly, they also point out (in Response 2) that December and January received only 144 inches – "much less than average over the 7 year period". And these dry conditions continued until Feb 15th, the weekend after Presidents' Weekend. As the graph below shows, the vast majority of the snow came in March and April.



I4-1 (cont.)

So, yes while the whole winter was perhaps average at best (and that is even debatable, as the chart below shows just about 330" at the summit), the snow did not come when the really large crowds of skiers would come.



2

As most everyone knows (including SVRE) the really big crowds come during Christmas, MLK and Presidents' weekends, and, to a lesser extent, spring breaks. So, if one were going to do an honest job of assessing traffic according to CEQA ("average winter ski conditions") it would be one when average snow fell during December thru February. These are the big crowd months. The snowfall of 2011-2012 DID NOT represent an average winter for when the snow fell.

Response to Item 2: *"No evidence to suggest that the low skiers count caused the busiest ski days (upon which existing conditions are based) of the 2011-12 ski season to be lower than peak days in busier years"*

This is totally incorrect. It is not that 11,367 skiers (5th busiest day in 2011-12) is not a busy day, but there have been plenty of busier ones. For example, the peak day for this 2015-16 ski season (which has had average snow fall) had over 16,000 skiers. So, during an truly average winter, when there is plenty of snow during Christmas and the holiday weekends, there can be a string of very busy days, where the skier count is above 12,000 (quite common at Squaw!). Anecdotally, at the April 7 Squaw Valley MAC meeting, Kyle Creze, head of traffic control for Squaw, admitted that there were more than 25 days this season of "triple coning" – indicative of frequent heavy traffic coming into Squaw Valley. This was not the case during the 2011-12 winter.

Response to Item 3: Actual skier data does NOT support the assertion that when there are heavier snowfalls during December and January, the busiest days (and therefore the 5th) would be during those months. Actual skier data shows the 5th busiest day tends to occur later in the ski season.

To defend this assertion, the Final EIR states "during the 2010-11 season, Dec 30th, 2010 was the only Christmas Break day to have a greater level of skier attendance than the 5th busiest day which occurred on Feb 21st, 2011". What they conveniently do not point out is that there was basically no snow on the ground over Christmas, and that in the week prior to Feb 21st, 10 feet of snow fell in Squaw. There was a spike in attendance, as expected, that weekend.

This response misses the point. In an average year, with good snow during Christmas and Holiday weekends, all ski days will be busy. So, whether or not the 5th busiest day falls during Christmas or some other weekend, there will be string of very busy days

3

with totals very close to each other. The year 2011-12 had little snow over Dec and Jan, and therefore did not represent an average year resulting in skier attendance being "spikey". In comparison, during the current 2015-16 season (again an average snowfall year), the parking lot was at or near capacity almost every day from before Christmas until after New Years, indicative of very heavy traffic loads.

Response to Item 4: "There is no evidence to suggest that skiers during the 2011-2012 season "gave up on the season as lost."

To substantiate this claim, the Final EIR says "following the Presidents Day Weekend in 2012, the remainder of the season (which extended to April 22, 2012) accommodated 330,000 total skier days according to skier data provided by Squaw Valley USA."

There is no dispute that with heavy snowfall, at least the local skiers will come out. But it is apparent that after President's weekend in any average winter, including this 2015-16 winter, (especially with the early start to Daylight Savings Time), skiers do not come out in the large numbers that they do in December through February.

Interestingly, the FEIR data for 2011-12 data substantiates this claim. The Final EIR states that there were ONLY 230,000 skier days before President's weekend that year, as compared to the 330,000 afterwards. This is a 40/60% split, and a 560,000 total skier count. Compare that to the 2010-11 season, which had an more than average snowfall pattern There were 436,000 skier days before President's Weekend and only 277,000 afterwards; a 60/40% split of the 713,000 total skier count. That is more normal.

To put the "nail in the coffin", the response to item 5 says "The comment is valid in that during a "good season" in which significant snowfall occurs in December and January, many of the busier days of the season occur during these months." That is exactly my contention. Thank you FEIR.

Response to item 5: "... any assertion that the 30th busiest day would be nearly as busy as the fifth or tenth busiest day is not supported by either Squaw Valley Road ADT counts or the Squaw Valley USA Ski Resort skier/boarder attendance totals"

Of course, by definition, the 30th busiest day will have a lower traffic and skier count number than the 5th or 10th. But that is not the contention. The contention is, and is

4

supported by data from this 2015-16 ski season, that during an average snowfall year, the top 5, 10 or even 15 busiest days can have skier and traffic counts that are very close in numbers to each other.

Response to Item 6: "Winter peak hour and daily conditions along Squaw Valley Road are already unacceptable and would have shown slightly exacerbated conditions" if there were an adjustment of 5% made to skier count.

Two points need to be made. First, to many of us, the fact that the winter peak hour and daily conditions along Squaw Valley Rd are already unacceptable is the "elephant" in the room. To use this as an excuse to allow the conditions to get even worse is illogical. There is no better argument that can be made to limit the allowed size of the proposed project.

I-4-1 (cont.)

Second, the response keeps focusing on total snowfall and ignores the fact that it is much more important to consider when the snow falls. With an average snow fall year, the crowds will arrive in large numbers during the holiday week and weekends, but if most of the snow falls later in the season, these same traffic numbers never materialize.

Response to Item 7: "The responses provided here have confirmed that the data from the 2011-2012 ski season provides an accurate depiction of conditions during approximately the fifth busiest day of a typical winter ski season"

I contend just the opposite. Attempts to prove this assertion are based on partial facts and half truths. When all the data is examined, it is clear that the late snowfall in the 2011-12 limited the skier traffic during what would normally be the busiest time of the season. The winter of 2015-16 is a perfect example and fresh in everyone's mind of what the traffic conditions are really like in a normal "average" snowfall year.

Finally, as a result of this faulty analysis, another faulty conclusion is made. Page 3-89 of the Master Responses chapter of the Final EIR states that the level of service of the intersection of Squaw Valley Rd and Far East Rd can be reduced to F (CP-1) since

- Peak periods at Squaw Valley occur for limited periods of time and during a relatively small number of days per year;

5

- Other measures are available to manage the peak traffic flows, such as three-lane operation with cones, signage, and traffic personnel;

However, during an average winter season (not even counting summer festival weekends), we now know that triple coning is used more than 25 times (as was done this year) and that infers traffic loads are heavy. Implying, therefore, that the peak periods occur during a relatively small numbers of days is fallacious.

Thank you

David Stepner
1064 Lanny Lane
Olympic Valley, CA 96146

6

I4 David Stepner April 26, 2016

I4-1 The first part of this comment letter presents an in-depth comparative analysis of snow conditions during the 2011-2012 versus 2015-2016 ski seasons, and concludes "that the winter of 2011-2012 was anything but average." It contends that the 2015-2016 season was in fact a 'normal or average' year. The letter also provides a response by response rebuttal to the FEIR responses pertaining to this particular topic. It presents new technical information relating to the amount of snow that falls on weekdays, weekends, and holidays. It describes snowfall during the early versus late winter months. It describes how different areas of the Tahoe Region can have different snowfalls during the same time period.

Much of the comment letter addresses points answered in the portion of the FEIR traffic Master Response related to the use of 2011-2012 ski season data to represent existing winter conditions. Many of the comments question the content of the Master Response, or point out disagreements with the Master Response, but either do not provide substantial new information, or do not directly refute the key element of selecting and analyzing the 5th busiest winter day in the traffic analysis. The traffic analysis focusses on peak day/peak hour traffic conditions, with the equivalent of the 5th busiest day of the year being the "peak day". Issues related to the number, character, date, or conditions associated with any other peak day, or days, would not affect the results of the EIR traffic analysis. As discussed below, and in the Master Response, an appropriate 5th busiest peak day condition was selected and analyzed in the EIR. The commenter does not provide evidence of another more appropriate date to represent a 5th busiest peak day.

CEQA Guidelines Section 15125(a) states the following: "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which the lead agency determines whether an impact is significant." The detailed snowfall information contained in the comment letter is being used to support an argument that a different baseline condition, such as the 2015/2016 ski season, which occurred after the DEIR had been published, should have been studied, which is contrary to the direction in CEQA Guidelines Section 15125(a).

The Notice of Preparation (NOP) for the DEIR was released in October 2012. It is apparent from Table 9-1 of the DEIR that the technical analysis was substantially complete by early 2014 as evidenced by the lack of a full 2013-2014 ski season of reported skier visits. When the data available to the analysts at that time is examined, it is clear that the choice to use the 2011-2012 season data was correct, and accompanied by supporting evidence. The 5th busiest day of 2011-2012 ski season had two percent more skiers at Squaw Valley Ski Resort than the 5th busiest day of 2010-2011 season and 6 percent more skiers than the 5th busiest day of 2012-2013 season. Attendance on the 5th busiest day of the 2011-2012 season was 23 percent greater than the 5th busiest day of the 2013-2014 season (through March 2014). The design study period was Saturday, February 12, 2012, in which Squaw Valley Road carried 12,906 vehicles. This was the 7th busiest travel day of the winter season, and less than 100 vehicles away from being the 5th busiest travel day (see Table 9-4 of the DEIR).

The conclusion on this topic is very clear: CEQA Guidelines require the use of a baseline setting that is tied to the issuance of the NOP, and that is precisely how the DEIR transportation impact analysis was prepared.

The second paragraph of the comment letter states: "Recall that CEQA requires that measurements of traffic volume should represent the peak average winter ski conditions." There is no such policy, guideline, or recommendation for this contained anywhere within the CEQA guidelines or statutes. It is worth further noting that transportation impact studies throughout the United States routinely use traffic counts collected on an average weekday to establish the existing condition. In other words, these studies do not search for the 5th busiest weekday of the year and use that condition to represent existing conditions. Thus, the DEIR's selection of the 5th busiest day of the ski season is a more conservative approach than is normally taken in traffic studies.

Page 5 of the comment letter states the following: "The winter of 2015-2016 is a perfect example and fresh in everyone's mind of what the traffic conditions are really like in a normal 'average' snowfall year." Most analysts would assert that the number of annual skiers/boarders is a more accurate measure of overall winter travel conditions than snowfall. This is because the number of skiers/boarders is directly linked to travel into and out of the Tahoe Region. The amount of snowfall plays a role in the decision to travel, and is typically positively correlated with skier/boarder visitation. However, the effect of snowfall on skier/boarder visitation can vary considerably depending on the day of the week, and month of the year in which snow falls.

I5

August 10, 2016

Placer County Planning Department
Alex Fisch
3091 County Center Drive
Auburn, CA 95603
cdraecs@placer.ca.gov
Subject: Comments on Village at Squaw Valley Specific Plan Final EIR

Dear Mr. Fisch-

Last year I submitted comments on the Draft EIR for the Village at Squaw Valley Specific Plan, which were responded to in the Final EIR published this year (response I226), which I appreciate. However, several of my comments were not adequately addressed, and the EIR was not amended. This means that the Final EIR still contains several transportation-related errors, which unfortunately renders the FEIR inadequate. Below are my additional comments.

1. Re: I226-3: My main comment, which remains, is that the project sponsor and Placer County should adopt a policy of No Additional Traffic (NAT, previously known as No Net New Trips or NNNT; the name has changed but the policy is the same). This policy would ensure that the proposed development could occur without increasing traffic volumes, which would completely mitigate all of the significant and unavoidable traffic-related impacts to transportation, air quality, noise and visuals. It would also substantially reduce parking demand at Squaw Valley, reducing construction costs for the sponsor by eliminating proposed structured parking facilities. I have attached the revised version of the NAT policy.

   The FEIR on pages 7.2.5-314 through 7.2.5-316 dismisses NAT as infeasible for several incorrect reasons which I would like to address:

   - "…the [examples of NAT policies in other jurisdictions] mentioned above often rely on robust publically-funded rail transit systems as a key component of their TDM programs, whereas transit in the study area is limited to fixed-route bus lines that operate at relatively low frequency."
     - It is true that Squaw Valley lacks a robust transit connection, especially to the Bay Area and Sacramento, which would serve as the foundation of non-auto transportation. However, Squaw/Alpine could charter buses from the Bay Area and Sacramento for its guests, similar to multiple hotel, resort and casino developments across California. This would establish the transit "backbone" that has made other NAT policies successful.

   - "Tahoe region housing is more spread out, and visitors have gear and are not as likely to be able to walk to a stop."
     - Visitors will not necessarily have to walk a long distance to a bus stop with their gear; there are other options for sustainable travel such as carpooling, ridesharing and even bicycling, all of which can accommodate ski gear, golf clubs, etc. Furthermore, passengers can bring their equipment on buses, and high-quality bus stops (such as those implemented in the ski resort town of Aspen, Colorado) are appealing and convenient. Lastly, most visitors are capable of walking moderate distances carrying their ski equipment, such as within Squaw Valley from the far end of the existing parking lot.

   - "The comment recommends the placement of permanent year-round in-ground counters at two locations along Squaw Valley Road. The comment also suggests the use of hose counters to measure daily volumes at various private driveways to isolate their traffic generation. The placement of hose counts across private driveways is problematic."
     - The response is correct that placement of hose counters across driveways (as was suggested in my comments on the DEIR last year) is problematic. In response, I have revised the NAT policy to not require any hoses across driveways; instead the policy would be implemented by simple traffic counter cameras mounted on existing traffic signal or utility poles within the public right-of-way.

I5-1 (cont.)

In summary, the NAT policy is a feasible mitigation measure that should be applied to the proposed development. The conclusion in the response to my comment that "…it would be very challenging to effectively implement a [NAT] policy, and the likely result (if [NAT] is required) is that the proposed project could never get constructed" is an unacceptably defeatist attitude given the Sierra ski industry's climate change crisis. If it were true that the development cannot be constructed without generating new traffic (which is absolutely false), then the development should not be approved.

I5-2

2. Re: I226-8, 14 and 16: I commented that the DEIR does not address how increases in traffic volumes along Squaw Valley Road would impact pedestrian and bicycle safety for those attempting to access the existing Squaw Valley Path. The response to this comment completely dismisses this safety impact and does not respond to my question of how pedestrians and bicycles crossing Squaw Valley Road would be impacted by additional traffic, especially given that traffic control personnel would not be stationed at every intersection. Furthermore it was disclosed that the purpose of the traffic personnel is not to stop Squaw Valley Road traffic for pedestrians crossing street but to "wave folks through" which is not only illegal (as pedestrians always have the right-of-way at uncontrolled intersections) but creates unsafe ambiguity regarding who should yield to whom. This is an existing safety impact which the project would exacerbate (even with installation of high-visibility crosswalks as I suggested), but this is not disclosed in the EIR.

I5-3

3. Re: I226-17: In response to traffic noise concerns, the FEIR has introduced a new mitigation measure to install rubberized asphalt along Squaw Valley Road. Because this is a new mitigation measure that was not described in the DEIR, the EIR needs to be recirculated, rather than deleting and relabeling an existing traffic mitigation measure. Furthermore the secondary impacts of this new mitigation measure need to be assessed regarding stormwater runoff and water pollution, odors and air quality, as rubberized asphalt is certainly not without environmental consequences.

I5-4

4. Re: I226-19: The response is dismissive of the transit delay resulting from the project. Calculations attached in my comments on the DEIR, pulled from traffic analysis data in the DEIR, show delays to transit of 2 to 5 minutes which is substantial, but the response notes that delays would be "modest" on the order of 12 to 42 seconds, which is false. There is a significant impact to transit which the EIR does not disclose.

I5-5

5. I226-20: The response is dismissive of the traffic congestion that will ensue from the project's traffic generation at the bottleneck intersection of CA 89 and Squaw Valley Road. As my comments on the DEIR noted, the SimTraffic analysis of this intersection in the DEIR is flawed which results in significant underreporting of delays under cumulative conditions. This is true for:

   - The Winter Sunday PM Cumulative Plus Project condition (Appendix G page 156), where only 62.6% of traffic demand is served, resulting in 950 vehicles queued up beyond the model extents; and
   - The Summer Friday PM Cumulative Plus Project condition (Appendix G page 163) ,where only 63.2% of traffic demand is served, resulting in 1,370 out of 2,740 cars are queued up beyond the models extents.

The response that "The results are not incorrect" is false; this is a major error that does not pass fundamental traffic simulation requirements. Close to half of the traffic demand is unable to enter the simulation network due to congestion, which means that the very high delays that those vehicles experience is not captured within the reported values. This flaw can be easily remedied by simply extending the roadway links within the SimTraffic model that radiate from the intersection and rerunning the simulation, so that all vehicles are able to able to enter the network and have their delays reported. Please correct the simulation and update the reported traffic delays at this intersection.

Respectfully submitted-

Greg Riessen, PE

NAT: the No Additional Traffic Policy for Squaw Valley

Moving more people in fewer cars

By Greg Riessen *(see resume below) June, 2016*

Squaw Valley suffers from congestion during peak winter ski days. Now, a major new development project is seeking approval that could generate additional traffic, further exacerbating congestion while injecting noise and air pollution into the valley year round.

Does this new development have to result in additional traffic? The Village at Squaw Valley Specific Plan (VSVSP, the project) Environmental Impact Report (EIR), prepared by Placer County, says yes. It discloses that the project would result in multiple significant and unavoidable transportation, noise and air quality impacts due to the large increase in traffic that the report projects would occur. These findings confirm the suspicion of many members of the Squaw Valley community, who cannot support the project out of concern for the environment.

However, Squaw Valley Real Estate (the sponsor) believes that the traffic volumes in the EIR are over-inflated because the project is pedestrian-oriented and includes completion of the Squaw Valley Bike Path. The project also incorporates multiple Transportation Demand Management (TDM) measures that provide alternatives to driving, such as new transit services within Squaw Valley and preferential parking for carpools. These measures could reduce traffic volumes for both the new development and existing vehicle trips, offsetting traffic generated by the new development.

Who is correct, the County or the sponsor? Must new development unavoidably result in additional traffic, or could TDM measures offset traffic growth? They are both right. It is true new development can be constructed without adding traffic if there is a commitment to TDM measures, especially when the baseline condition includes minimal measures, which is Squaw Valley's situation. But, without a stated commitment to offset traffic volumes, TDM measures will likely never be fully implemented and utilized, and traffic-related significant environmental impacts will result.

So, what is lacking from the project is the commitment to not increase traffic volumes. That is the genesis of the No Additional Traffic (NAT) policy. NAT is the opportunity for the sponsor to showcase environmental leadership toward combatting climate change, cutting traffic congestion and promoting livable communities, while also reducing construction costs of structured parking facilities.

The sponsor and Placer County should amend the EIR to attach the NAT policy as a mitigation measure on the plan. NAT would stipulate that development phases could be approved only if observed traffic volumes on Squaw Valley Road have not increased above the existing baseline volume. With this commitment, the sponsor would be strongly motivated to take actions that reduce the traffic generated by the existing ski resort, and also take actions that minimize the traffic generated by the new development. Only if the sponsor is successful at maintaining traffic volumes at or below the baseline could additional phases of development could be approved.

Implementation of NAT would be simple, cheap, automated, and transparent. A video camera (see Figure 1 for example) that counts vehicles traveling along Squaw Valley Road would be installed between CA 89 and the intersection with Squaw Creek Road, on an existing utility pole (Figure 2, green marker). A second video counter would be installed on Squaw Creek Road (Figure 2, pink marker). These two cameras would measure, and isolate from each other, changes in traffic volumes associated with both the Squaw Valley Ski Resort and the Resort at Squaw Creek. These two destinations generate the preponderance of existing traffic volumes in the valley, and are also the valley's two sites of proposed major developments.

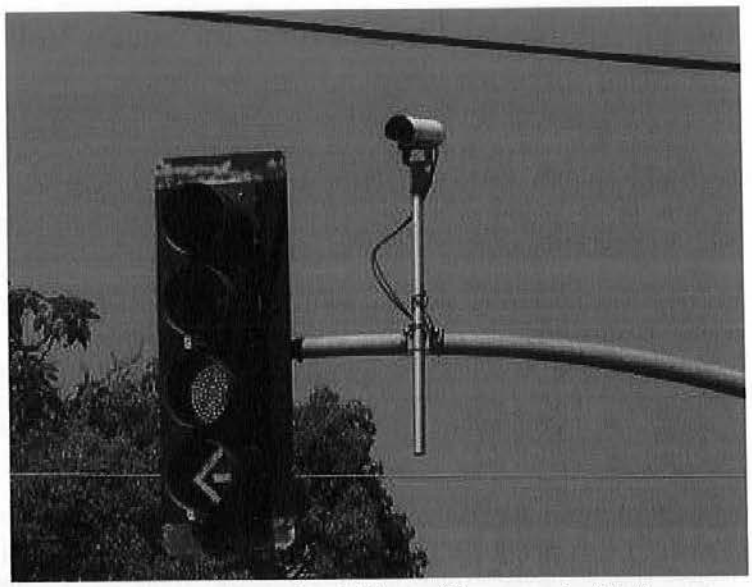


Figure 1 - Example of video traffic counter installation

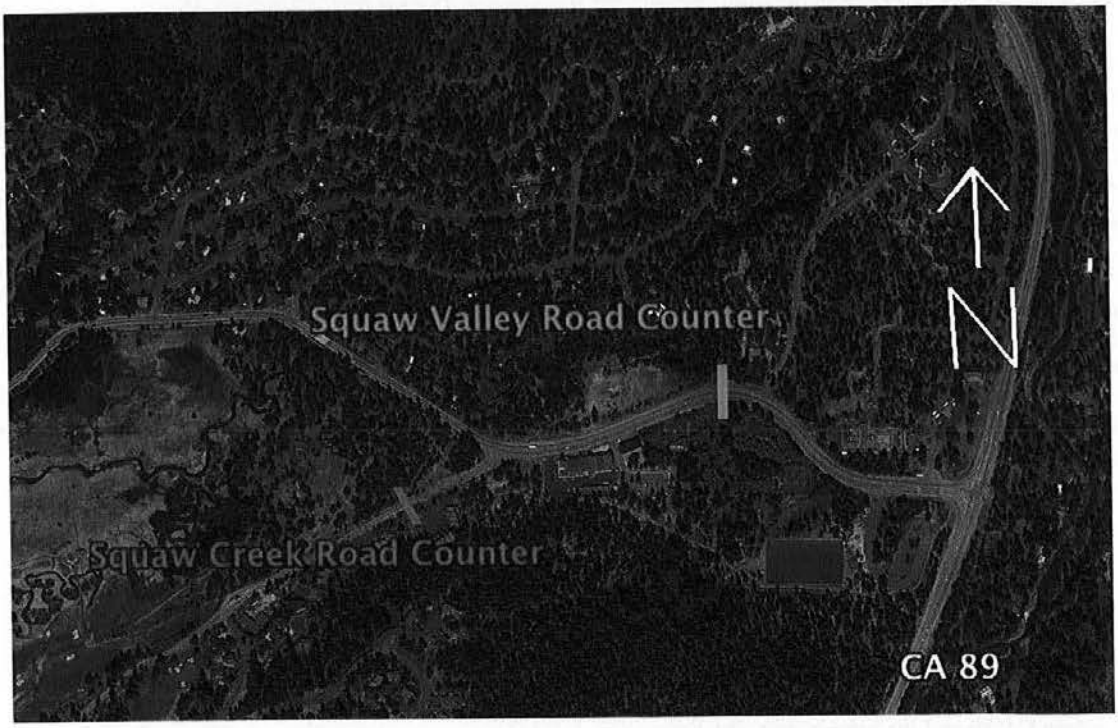


Figure 2: Locations of traffic counter video camera installations in eastern Squaw Valley. In green, the Squaw Valley Road counter would measure traffic growth associated with the sum of Squaw Valley Ski Resort and the Resort at Squaw Creek. In pink, the Squaw Creek Road counter would measure traffic growth associated with only the Resort at Squaw Creek. Traffic growth associated with only Squaw Valley Ski Resort (including the East Parcel) is therefore calculated by subtracting the traffic growth of the pink counter from the traffic growth of the green counter.

Vehicles would be anonymously and automatically counted day and night, year round, without any human labor required. Counts would be posted online in real time, ensuring transparency. After 12 months of counting, the baseline average daily traffic volume would be established for both the summer and winter seasons. After 24 months, trends over time would become evident.

The first phase of the VSVSP could be approved now, but subsequent phases could only be approved if the ongoing traffic count demonstrates that, after occupancy of the first phase of development, traffic volumes have remained at or below the baseline volume, for both the summer and winter periods. If counts are observed to have increased, then subsequent phases could not be approved until additional TDM measures were deployed and traffic counts were observed to have decreased down to the baseline.

The beauty of NAT is that it empowers the sponsor to add, modify or drop any TDM measure as conditions and technologies change over time. In fact, the sponsor may not need to implement any TDM measures at all if the new development is inherently pedestrian-oriented and would not generate additional traffic, as the sponsor asserts.

What additional TDM measures could the sponsor implement in order to reduce traffic? Here are several options that the sponsor could consider:

1) Charter shuttle buses for weekend trips from the Bay Area to Squaw Valley and Alpine Meadows, similar to the operation at multiple other ski resorts. In San Francisco there are over 400 commuter shuttle buses, driven during the workweek but parked over the weekend, which could be dispatched between the Bay Area and Squaw Valley to serve the major weekend travel market. Guests in Squaw Valley that do not have access to a personal car would drive much less frequently during their visit, resulting in substantial traffic reductions both within and outside of the valley.

2) Procure and operate high quality local transit vehicles and facilities, such as low-floor buses to facilitate loading of equipment, enclosed transit shelters with real-time arrival information, and improved pedestrian connections to transit stops. A good example is the VelociRFTA Bus Rapid Transit system serving Aspen.

3) Develop the East Parcel as a parking interceptor facility with convenient shuttle service, similar to the operation at Northstar, rather than the current proposal of a parking spillover facility. This would create an inconvenience to frequent personal auto use, incentivizing skiers and employees to use transit, and encouraging guests to remain in the valley rather than driving around Lake Tahoe.

4) Partner with rideshare, carshare and other emerging transportation companies to enable guests to use regional transit into Squaw Valley while still enjoying convenient auto access during their visit (for hiking and similar activities not well served by local transit).

5) Pursue and support further improvements and connections to the Squaw Valley Bike Path, such as an extension to Truckee.

6) Work with Caltrans to install four-person High Occupancy Vehicle (HOV4+) lanes (aka carpool lanes) on the shoulders of CA 89 between Squaw Valley Road and Truckee. The existing roadway is wide enough for four lanes (there were four lanes during the 1960 Winter Olympics). Striping HOV lanes would provide a faster travel time for buses and carpools during peak periods, incentivizing their use by skiers, guests and employees.

7) "Casual carpool" pickup spots could be established in Tahoe City and Truckee, and the sponsor could partner with carpool technology companies (e.g. Uber, Lyft, Scoop, etc) to facilitate the convenient

formation of carpools. The sponsor could provide free overnight lockers for day skiers to make transit and carpooling more viable.

8) Implementation of parking management strategy best practices. Squaw Valley is unique among major ski resorts in not charging for parking within the core village. The sponsor could charge for parking for skiers, guests, and employees. Daily lift tickets and season passes should be reduced in price correspondingly to result in no added cost to skiers. Free parking could exist at the East Parcel while parking in the village would be charged, and a free drop-off area in the village could be established.

This is only a partial list of TDM measures that the sponsor could implement. With NAT, the sponsor is not required to perform any specific tasks; rather, the sponsor is simply required to maintain traffic volumes at the baseline.

A commitment to NAT has been proven as an effective and feasible traffic reduction strategy with other major development projects, including Stanford University, the University of Washington, and the cities of Santa Monica and Mountain View. Those projects were able to be built with fewer structured parking facilities than typical auto-oriented development, resulting in a win-win of reduced project construction costs for the sponsor and reduced traffic for the community. In fact, due to Squaw Valley's singular roadway, implementation of NAT using video camera traffic counters would be easy and automated, compared to those listed examples (which require collecting traffic counts at multiple roads using human labor, associating traffic to various destinations, and discounting pass-through trips, among other tasks).

In conclusion, this project does not have to increase traffic and make life worse for residents and visitors in the valley. A simple and flexible tool has been proven to successfully facilitate development without increasing traffic, and it should be employed in Squaw Valley. Placer County should revise the VSVSP EIR to include the No Additional Traffic policy as a mitigation measure, which would mitigate all traffic-related impacts related to transportation, noise and air quality to a less-than-significant level.

Greg Riessen, PE works as a traffic engineer, transit planner and environmental practitioner for the City and County of San Francisco, and previously at Fehr & Peers Transportation Consultants. He works to create sustainable transportation options for residents, commuters and visitors that are competitive with driving. His projects include comprehensive Travel Demand Management programs for major development proposals, including ongoing performance monitoring and enforcement; design and implementation of transit-priority infrastructure including smart traffic signals and dedicated carpool lanes; and partnerships with transportation tech companies to conceive new types of mobility, including rideshare and automated vehicles. His family has shared a home in Squaw Valley since 1990.

I5 Greg Riessen, PE August 10, 2016

I5-1 As an introductory statement, the comment states that the commenter's DEIR comments were not adequately addressed in the FEIR and the EIR was not amended, rendering it inadequate. More detailed responses are provided below in responses to comments I5-2 through I5-5.

The commenter reiterates comments provided on the DEIR regarding a proposed policy of No Additional Traffic (NAT) or No Net New Trips (NNNT) to mitigate the project's traffic impacts. This issue was addressed in responses to Comments I226-3 through I226-5 in the FEIR. The commenter states that NNNT would ensure that the project would not increase traffic volumes, which would completely mitigate all of the significant and unavoidable traffic-related impacts to transportation, air quality, noise, and visuals. This is incorrect. Not all of the project's significant and unavoidable impacts (which are listed in Section 18.2 of the DEIR) are related to traffic, nor would they all be mitigated to less-than-significant levels by the proposed NNNT policy.

The commenter asserts that previous responses relating to the lack of feasibility of such a program are not valid (FEIR responses to comments I226-3 through I226-5). The commenter suggests a charter bus system to transport guests from the Bay Area and Sacramento is feasible and could be effective. The commenter states that winter resort visitors may not have to walk long distances with their ski/board gear and are capable of walking shorter distances. The commenter also suggests an alternative means of measuring traffic levels on Squaw Valley Road that does not rely on those counts. Each of these comments is addressed below.

- The citation from the FEIR references high-tech campuses with "…robust publically-funded rail transit systems…" while noting that transit in Squaw Valley is limited to fixed-route bus lines. The commenter suggests the use of charter buses between Squaw Valley and the Bay Area and Sacramento; however, charter buses are not rail transit. Further, to achieve NNNT policies, the project applicant would need to limit guest's access via personal vehicles and direct them to charter buses as an exclusive, or near exclusive method of resort entry. This approach would put Squaw Valley Real Estate, LLC at a competitive disadvantage to other resorts. Those visitors that could no longer drive to the Village at Squaw Valley would presumably select to drive to resorts other than Squaw Valley.

  While a charter bus system could accommodate some winter day-use resort attendees as it does presently, the use of a charter bus for multi-day family, friend, business, or related outings would prove more challenging. Multi-day trips typically include a variety of additional clothing, food, drinks, and games/toys in addition to ski/board gear. Transporting this amount of gear by charter bus would create many logistical challenges. Additionally, overnight winter resort guests often place a high value on time and convenience, neither of which is typically offered by charter bus operations. Provision of convenient and direct service to a resort or venue does not guarantee ridership. For example, ridership to San Francisco 49er football games at Levi's Stadium via Santa Clara Valley Transportation Authority (VTA)'s new express train have been substantially below projections according to recent reports (http://www.sfgate.com/49ers/article/VTA-49ers-express-train-tickets-sales-9217741.php). This is not necessarily because of the quality or cost of service, but rather personal decisions regarding which mode of travel

best accommodates their overall needs. Further, a free-fare skier shuttle program was operated by the Truckee North Tahoe Transportation Management Association in the winter of 2012-2013, the results of which was low ridership despite a strong marketing effort (see further details on pages 3-27 and 3-28 of the FEIR).

- The citation from the FEIR notes that in contrast to the high-tech campuses, housing in the Tahoe region is more spread out and visitors with ski gear "…are not as likely to be able to walk to a stop." This is not the only reason as to why the County believes NNNT to be infeasible, however. See, for example, the portion of response to comment I226-3 in the FEIR that discusses overall feasibility. Regarding the commenter's suggestion that in addition to walking, visitors could carpool, rideshare, and bicycle, these travel options would all be part of project operations, as detailed in the DEIR and FEIR.

- The commenter's suggested means for measuring traffic volumes on Squaw Valley Road as part of a NAT or NNNT program has merit. However, there would likely be data interpretation and traffic volume responsibility issues if this program were actually implemented. The suggested count locations would identify all trips on Squaw Valley Road west of SR 89 as either being associated with the Resort at Squaw Creek or all land uses west of Squaw Creek Road. The commenter suggests that because the overwhelming majority of trips west of Squaw Creek Road are associated with Squaw Valley Resort, it is reasonable to use that volume as a surrogate for trips generated by the resort. The commenter suggests that a 12-month baseline condition be established and that monitoring continue with Phase 1 of the project to see how volumes change. However, changes in traffic volumes on Squaw Valley Road west of Squaw Creek Road could be attributable to differences in the number of day-use skiers, proposed project trips, traffic associated with new land development (both construction and operation), and changes in usage of existing residences. In other words, the project's fate as proposed in the NAT program (i.e., no additional development if traffic volumes increase) could conceivably be caused by other land uses or activities, and be falsely associated as being project-related. For this reason, while the technological tool for counting vehicles appears sound, the suggested approach for determining the project's responsibility to overall traffic growth in Olympic Valley is not.

Finally, the comment reiterates comments provided on the DEIR regarding the NNNT policy constituting a feasible mitigation measure, in the commenter's opinion. This comment does not change the conclusion of the FEIR in response to Comment I226-3 regarding overall feasibility.

I5-2 The comment reiterates comments provided on the DEIR regarding how increases in traffic volumes along Squaw Valley Road could affect pedestrian and bicycle safety. Pedestrian safety impacts are addressed in responses to comments I226-14 and I226-15 in the FEIR.

Regarding the comment about traffic control personnel along Squaw Valley Road waving vehicles through rather than not stopping traffic for pedestrians, this statement misinterprets response to comment I226-16 in the FEIR, which describes this activity as a past practice that is not recommended as mitigation for the project.

The comment states that this is an existing safety impact that the project would exacerbate, however, no specifics are provided explaining how the project would exacerbate the impact. As explained in response to comment I226-15 in the FEIR, the project would add a crosswalk adjacent to the Squaw Valley Road/Far East Road intersection. Additionally, traffic control officers would be situated at select intersections and would assign right-of-way to allow users passing through those intersections. This is a standard procedure employed at numerous resorts, sporting facilities, and other large gatherings.

I5-3 The comment states that the EIR should be recirculated to include evaluation of the potential secondary effects of Mitigation Measure 11-5, which was revised in the FEIR to require the project applicant to install a rubberized hot mix asphalt overlay (RHMA) or equivalent surface treatment on top of the existing conventional asphalt segments of Squaw Valley Road to reduce roadway noise. The comment lists possible secondary effects such as effects related to stormwater runoff and water pollution, odors, and air quality.

Revised Mitigation Measure 11-5 is included in the Master Response regarding noise in the FEIR, along with supporting discussion regarding roadway noise reduction that could be achieved with implementation of this mitigation measure. Page 3-46 of the FEIR states, "Installation and function of the rubberized asphalt would be similar to standard asphalt application and maintenance procedures with the added benefit of reducing traffic-related noise." Because of the similarity between rubberized and standard asphalt, secondary effects related to installation and operation would also be similar. The proposed project includes installation of standard asphalt in the Main Village Area and the East Parcel. The DEIR describes overall project effects under Impacts 13-2 and 13-7 (stormwater runoff and water pollution), 10-1 and 10-2 (air quality), and 10-5 (odors). Where impacts are identified as potentially significant, mitigation is recommended. For these reasons, the DEIR and FEIR analysis adequately evaluates the secondary effects associated with installing rubberized asphalt; no changes to the DEIR are necessary. Also, see the Master Response regarding recirculation in the FEIR.

To provide further information about this topic, the following provides a summary of a Caltrans report titled *Asphalt Rubber Usage Guide* that was prepared in January 2003 (available: http://www.dot.ca.gov/hq/esc/Translab/ormt/pdf/Caltrans_Asphalt_Rubber_Usage_Guide.pdf). The report indicates that since the late 1970s, numerous asphalt rubber projects have been implemented in California. Since that time, Caltrans has continued to study, test, and use rubberized asphalt materials. These materials can be used wherever conventional asphalt concrete or asphalt surface treatments would be used, and have been used with success in most of the geographical and climate zones in California and Arizona from the low desert through the mountain/alpine zones. Regarding issues and concerns with asphalt rubber, odors associated with applying asphalt rubber may be stronger than conventional asphalt, but emissions are similar and can be addressed with proper production and construction methods. No new chemicals are associated with asphalt rubber, and use of asphalt rubber does not present a health risk to paving personnel.

I5-4 The comment states that FEIR responses were dismissive of the DEIR comments regarding transit delays resulting from the project. See response to comment I226-19 in the FEIR. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

I5-5 The commenter expands upon DEIR comment I226-20 regarding traffic operations at the SR 89/Squaw Valley Road intersection. The specific comment relates to the percent demand served being low during certain cumulative analysis time periods and the resulting potential that vehicles that do not pass through the intersection would queue beyond the limits of the SimTraffic model, thereby excluding their delay from the calculation. In response to this comment, the cumulative scenarios listed in the comment were investigated. It was found that the reported delay was correct, but that the percent demand served represented only 10 of the 15 minutes being modeled as the peak 15 minutes of the peak hour. This explains why the reported percent demand served in the two examples listed in the comment were about 63 percent, which is equivalent to about 95 percent of the demand that would occur during those 10 minutes (i.e., 63 percent divided by 66.7 percent). Additionally, the SR 89 approaches to the intersection were rechecked and found to be at least 1,500 feet in length.

Therefore, given that the actual percent demand served was closer to 95 percent and the SR 89 and Squaw Valley Road approaches were of substantial length to capture all queued vehicle delay, the intersection analysis results at this intersection are correct.

Kathi Heckert

From: Alexander Fisch
Sent: Wednesday, August 10, 2016 8:10 AM
To: Kathi Heckert
Subject: FW: comments on Squaw development

I6

Please add to the project file

From: Bill Brougher [mailto:billbr@gmail.com]
Sent: Wednesday, August 10, 2016 1:01 AM
To: Teri Ivaldi; Jennifer Montgomery; Jim Holmes; Robert Weygandt; Kirk Uhler; Alexander Fisch; richard@roccucci.com; David Boesch; Jennifer Merchant
Cc: Francoise Brougher
Subject: comments on Squaw development

Dear Supervisors, Alex and Richard, David and Jennifer,

My wife Francoise and I are condo owners at Squaw Village. We bought recently, about 3 winters ago, and were fortunate enough to buy two units near each other overlooking the Funitel. Squaw is not our primary home but have 3 racers and have come up from the Bay nearly every winter weekend more than 10 years.

Our interest in the redevelopment plans for Squaw have waxed and waned since our purchase. We took a risk when buying because, at the time, development would have impeded some of our view, or at a minimum would have certainly changed the view for the worse with the previously proposed hotel on Red Dog. For that scaling back of the plans we are thankful.

Since this time we have been somewhat on the fence with the development. Well, it doesn't affect us any more, right? In looking more closely at the plans recently we both independently concluded that the currently proposed redevelopment plan may not be in the best interest of Squaw or the region. Ultimately that is for you and the community to decide, but we wanted to share some of our concerns in case they help with continued discussion in the community and with KSL.

I6-1

- **Plan does not address Hwy 89 traffic**. The plan goes into detail with road improvements in the Squaw area, but these roads are not really the problem. The major sustained jams are today on 89, not on the Squaw access road, and they will get worse.
- **Community benefits (KSL concessions) are not significant**. Much is being made about creek restoration, for instance. We believe creek restoration is desirable, but why should it be tied to a massive construction project? We could restore the creek through private donations and a community work project instead. The other community benefits are similar in scope and alternatives.
- **The summer recreation center is a white elephant**. Without knowing what this building will be used for it is hard to forecast how much money will be made from it, something which is essential to predicting how healthy the business will be. It has a large footprint without justification or quantifiable payback. Rather than building a one-size-fits-all warehouse, it would be provide better visibility and predictability to define the space usage before building, like most architects would advise.
- **KSL as a going concern and ease of KSL's exit**. KSL is undertaking a large capital expenditure that will radically change the area. It is unclear, especially with continued low-snow years that KSL will be able to make money and it is unclear that the recreation center is the silver bullet to solve this problem. The previous developer Intrawest left the project. If the project is built and fails (or succeeds) then KSL can parachute out, but the community is left with the development. How thoroughly has the business

1

plan been reviewed and compared with neighboring projects such as Northstar? Where will all the vacationers come from? Is there really enough demand for such a large project?

- **Worst case alternative**. If the community decides not to proceed with KSL's project, what is the worst that can happen? Another developer may come in, but they'll know better than to come in with something unreasonable. We would wager that a new developer would do a better job approaching both the community and the project. We'd argue that the worst case may in fact be project approval and KSL flipping ownership to a new entity in 10 years. The community will have little to no control over this scenario, or about the selection of the new owner.
- **Squaw capacity**. Mountain Run is already a dangerous traffic jam on moderate days. Adding more vacationing skiers who are unfamiliar with the mountain will make it worse. What is the plan for getting skiers off the mountain, especially in the now-normal low snow years when Sunnyside is closed? What is the safe skier capacity for Squaw?

In summary, we question whether the current proposal is desirable in its current state. We can see the volume of work that has been put into the proposal but it leaves major concerns unaddressed. We'd recommend rejecting the current proposal outright, and to require new proposals from the current or future developers to share better financial plans in order to evaluate financial viability and also to include contractual guarantee of long term stewardship for the region.

Best regards,

Bill and Francoise Brougher

I6 Bill and Francoise Brougher
August 10, 2016

I6-1 The comment summarizes concerns about the project, including those related to traffic (specifically, on State Route [SR] 89), community benefits, the proposed Mountain Adventure Camp, and questions about the owner (KSL). Traffic is addressed in the DEIR (see Chapter 9, "Transportation and Circulation") and the FEIR (see the Master Response regarding traffic). Improvements to SR 89 are under the jurisdiction of Caltrans and neither the project applicant nor the County has control over planning or implementation of improvements. In addition, the SR 89 corridor from Tahoe City to Truckee is highly constrained by topography and the Truckee River and there are few feasible opportunities to provide roadway improvements. No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

The comments about community benefits and KSL as the project owner provide opinions regarding the merits or qualities of the project and do not address the content, analysis, or conclusions in the DEIR or FEIR. The Placer County Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project.

Finally, the proposed Mountain Adventure Camp is described and evaluated in the DEIR and is further addressed in the FEIR (see the Master Response regarding the Mountain Adventure Camp). No new questions or issues pertaining to the environmental analysis are raised in this comment. Therefore, no further response can be provided.

Business plans, potential success or failure of a business venture, changes in project ownership, and similar topics are not issues to be addressed in an EIR as they do not directly rate to physical environmental effects on the environment.

The remainder of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR or FEIR. Therefore, no further response is provided here. The Placer County Board of Supervisors will take the commenter's concerns into consideration when making decisions regarding the project

I6-2 Regarding the comment about the safe skier capacity of the mountain, this issue was addressed in the FEIR in response to comment I2-4. The response is excerpted as follows,

> The comment expresses a concern about public safety on the mountain due to the commenter's perception that the project permits improvements to uphill ski-lift capacity. The project does not include any improvements or modifications to on-mountain ski-lift capacity. Nonetheless, additional information regarding mountain capacity is provided here.
>
> The mountain has a maximum capacity, based in large part on the capacity of the ski lifts. The ski lifts can only transport a certain number of people per hour, thus effectively limiting the number of people on the mountain at any one time. Lines at the ski lifts may increase based on increased visitorship resulting from the project; however, the maximum number of people on the mountain would not change with project implementation.

Regarding the question as to how skiers will get "off the mountain, especially in the low snow years when Sunnyside is closed"; it is unclear what the comment is asking. It is assumed that the commenter is questioning how skiers may reach the base of the mountain during

conditions when there may be high numbers of skiers and limited pathways to the base of the mountain. It is presumed that skiers would use the same routes currently available to them during low snow periods. As identified above, the maximum number of skiers on the mountain is a result of lift capacity and not development or facilities at the base of the mountain.

I6-3 The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the DEIR or FEIR. The Placer County Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project.

Kathi Heckert

17

From: Eric Poulsen <epsquaw@yahoo.com>
Sent: Friday, May 27, 2016 11:13 AM
To: Alexander Fisch
Subject: Comments on final EIR - Village at Squaw Valley

To Whom It May Concern,

I had written a letter in regard to the EIR for the Village At Squaw Valley Specific Plan (State Clearing house #2012102023). There was a response to my comments. I am responding with comments to the comments (see below). Thank you for the opportunity to comment on the proposed project's environmental impacts.

Section 3.2.5-681. -3.2.5-687

These comments relate to the widening of the trapazoidal channel relative to stream restoration and flooding as responded to in 1221-8.

17-1 - comment - while the restoration of the creek and widening of the channel will help with the occurring and future sedimentation and also the potential for flooding as discussed, the work to accomplish this should be taken on sooner than later. The sedimentation and buildup of vegetation is getting to be worse and worse as time goes by. It is my understanding that the timing for the work proposed to widen the channel will not take place during the initial phases of the project.

- comment - the possible widening of the bridge was not addressed. The bridge seems to act like a dam which is making the sedimentation above the bridge worse and with the narrow waterway under the bridge it seems to act like a fire hose nozzle that accelerates the water below the bridge. With this, it could make the potential for flooding worse above the bridge.

The thought of the widening of the bridge was also noted in the letter from Lisa Wallace with the Truckee River Watershed Council (3.2.4-666 - 673) on page 2 of her letter (3.2.4-667) and responded to in 014-4.

These comments below relate to the Searchlight Pond Area as responded to in 1221-9.

- comment - The Searchlight Pond area does have the potential for flooding in the new village area. In past storm events it has overflowed. As noted in the response, I did make some suggestions on how this Pond could be improved and used for the benefit of the ski area, however, the concern still remains. The applicant should consider improvements to this pond area to avoid future impacts from overflow and potential flooding.

Thank you again for the opportunity to comment on the comments. Sincerely,

Eric Poulsen
P.O. Box 2491
Olympic Valley, Ca. 96146

Sent from my iPad

1

I7 Eric Poulsen
May 27, 2016

I7-1 The comment provides further comments with respect to comments previously submitted on the Draft EIR (comment letter I221) and responded to in the Final EIR. Three key areas of concern are raised: the timing of the proposed restoration of Squaw Creek, expansion of existing bridges of Squaw Creek; and the effects of Searchlight Pond on the project.

First, the commenter's opinion that restoration of Squaw Creek should occur early in project implementation is noted. As described on page 3-38 of the DEIR, the restoration of Squaw Creek would be completed by the recordation with the County of the Final Map that includes the 600th bedroom, which would be at approximately 40 percent of total project development. Stream restoration would be implemented in up to seven discrete phases and would commence with the Small Lot Final Map that records the 150th bedroom. Any consideration of implementing the creek restoration at an earlier time is a policy issue, and is not necessary to adequately mitigate any environmental impacts identified in the EIR.

Regarding the proposal to widen the existing bridges over Squaw Creek, see response to Comment O14-4 in the Final EIR (page 3.2.4-671). The Village East Road Bridge would be preserved in its current configuration and the restoration effort would be designed to integrate with the existing bridge. The Squaw Valley Road Bridge and Far East Road Bridge would be reconfigured and widened. During this effort, the bridge designs would be integrated with the restoration effort and bridge spans may be lengthened/widened to better accommodate restoration efforts. However, increasing the bridge spans is not necessary to successfully achieve desired restoration of Squaw Creek. Bridges across Squaw Creek are shown as part of the restoration area exhibits provided in Chapter 3 of the DEIR; Exhibits 3-18, 3-19, and 3-20.

With respect to the commenter's suggestion that the applicant consider improvements to Searchlight Pond, any such efforts are outside the scope of this analysis and would be considered as separate projects. The Searchlight Pond has been engineered, studied, re-engineered, and modified numerous times during the past several decades. The pond is usually dry, except when runoff is present. It is connected through large culverts to the Olympic Channel and Squaw Creek. The sole purpose of this sediment basin is to provide a small impoundment where entrained sediment in runoff can settle. The sediment is removed from the basin during dry conditions by Squaw Valley Resort pursuant to permits with the Lahontan RWQCB. The potential for the pond to result in flooding of the Village area has not been documented. The pond is not a flood control facility; therefore, when the pond overflows, this does not generate an increased flood risk. When overflowing, flows in the channel would be the same as if the pond were not present. Flood risk is associated with a failure of the impoundment when the pond is full, which is addressed in the FEIR. Further analysis of the potential for Searchlight Pond to result in flooding is provided in response to comment S4-12 in the FEIR (see pages 3.2.2-29 through 3.2.2-30).

18

MR. AND MRS. H. JAMES WULFSBERG
57 BELLEVUE AVENUE
PIEDMONT, CALIFORNIA 94611

AUGUST 8, 2016

County of Placer
Placer County Planning Commission
C/O Paul Thompson
Interim Agency Director
Community Development Resource Agency
Planning Services Division
3091 County Center Drive
Auburn, CA 95603

Subject: **VILLAGE AT SQUAW VALLEY SPECIFIC PLAN
SQUAW VALLEY GENERAL PLAN AND LAND USE ORDINANCE AMENDMENTS / REZONE / SPECIFIC PLAN, DEVELOPMENT STANDARDS, DESIGN GUIDELINES / LARGE-LOT VESTING TENTATIVE SUBDIVISION MAP / DEVELOPMENT AGREEMENT/WATER SUPPLY ASSESSMENT (PSPA 20110185) FINAL ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE #2012102023)
SUPERVISORIAL DISTRICT 5 (MONTGOMERY)**

Dear Mr. Thompson:

My wife and I are the owners of Unit # 12 of the Squaw Ridge Home Owners Association (Squaw Ridge). Squaw Ridge is a small planned unit development adjacent to Squaw Creek Road located a few hundred feet from the Squaw Valley Road intersection that provides the entrance to the Squaw Creek Resort. I write this letter to express our profound concern and objection to the scope, nature and extent of the proposed development under the Squaw Valley Specific Plan ("Plan"). The Plan that is in keeping with the Squaw Valley General Plan (General Plan) and Ordinances relating to the General Plan. The Plan is not justified by the voluminous documents and information submitted over the many months of the development process. We note that in the list of those consulted about this plan, Squaw Ridge is not mentioned. As long time owners in Squaw Valley, we have never been consulted about the Plan.

18-1

We purchased our home in Squaw Valley and later constructed major improvements to our home, based on the concept that all property owners' rights would be respected. We have also watched the Squaw Creek Development from the outset and know first-hand that the promises of the past are often forgotten by new owners over time. Much of what the Developers suggest for so-called mitigation is just that, promises, without any real substance.

STATEMENT OF OVERRIDING CONSIDERATIONS IS NOT WARRANTED

We have continued to follow the development process instituted by the application of Squaw Valley Real Estate, LLC for the Plan that include: 1.) amendments to the Squaw Valley General Plan and Land Use Ordinance, to amend the Plant Text and other changes; 2.) to rezone acreage in the Plan area; 3.) adoption of the Village at Squaw Valley Specific Plan (Plan); 4.) approval of a Large-Lot Vesting tentative Subdivision map; 5.) approval of a Development Agreement; and 6.) adoption of the 2015 Water Supply Assessment.

The Plan is so deficient that the Planning Commission will also consider and make a recommendation to the Board of Supervisors on certification of the Plan's Final EIR Report including "*Statement of Overriding Considerations.*" This fact alone demonstrates that the Plan goes well beyond the General Plan, requires modifications to existing General Plan restrictions, and most concerning, requires a "Statement of Overriding Consideration" to address the admitted shortfalls in the Plan. There is no basis for a finding of "Overriding Considerations."

The impact of the Plan consisting of over a quarter-million new square feet of new condo units, hotels, water parks, employee housing and so much more cannot be justified. The impact on the environment is obvious and admitted by the Squaw Valley Real Estate, LLC ("Developer"). The impact on the visual beauty of the Valley is so immense to be staggering. The lack of adequate provision for traffic, emergency vehicles and policing is outrageous and is admitted in the Plan and EIR.

SUMMARY OF DEFICIENCIES

The Plan proposed by the Developer violates the General Plan[1] and contains numerous unmitigated impacts. Some of these impacts are identified below.

1.) The Plan and EIR fail to the address the "common sense" reality that during peak winter periods, the Valley is already overwhelmed by traffic. The completely inadequate mitigations fail to address the impact on traffic.

[1] It is obvious that the Plan would violate the General Plan because the Plan contemplates not only the amendment to the General Plan but also several additional features that by their terms are inconsistent with the General Plan.

2.) The Plan represents a significant danger to the current and future owners and visitors to the Valley that emergency vehicles cannot make their way from one end of the valley during peak traffic periods.
3.) The Plan and EIR fail to address the fact that left turns from and to Squaw Valley Road into the Squaw Creek Road during even normal traffic periods are already extremely hazardous. Under the Plan, peak traffic periods with over 1,000 new residents and thousands of expected new visitors will be a grid-lock. The laughable notion that "traffic control" personnel can somehow reduce the impact ignores the fact that the number of vehicles in the Valley will skyrocket. The Plan does not include any offsetting transportation or parking out of the Valley, and this means that all traffic must come to the West end of the Valley creating even more gridlock.
4.) The plan and EIR fail to adequately address the already dangerous traffic condition, particularly during winter conditions that exists from Highway 89 to the "Y" at the turn off to the Squaw Creek Resort. The addition of more traffic and housing, deliveries, trucks, and left turns from the North side of Squaw Creek Road will make this hazardous condition even worse.
5.) while noting the "shadow" conditions that will be created over the entire development area, the Plan and EIR fail to mitigate this impact and fail to address the more important fact that the character of the Valley will be forever changed and turned into a "Vail, Colorado" like development devoted primarily to tourists rather than property owners in the Valley;
6.) while theoretically addressing the acute water conditions in the aquifer at the Meadows area, the Plan and EIR fail to address the long term impact of the decline in the aquifer. We have seen the well documented effect of depleted aquifers throughout the rest of California when long-standing aquifers have been depleted and rendered useless throughout California.
7.) The Plan, the EIR and common sense have presented absolutely no basis for any "Statement of Overriding Considerations" other than the desire of the Developer to make a profit.
8.) The Plan and EIR fail to provide adequate mitigation of the numerous admitted environmental impacts, including biological, hydrological, atmospheric, and virtual elimination of views from numerous vistas on the Valley. The proof of this fact is the proposed "Statement of Overriding Considerations that by its terms recognizes the lack of mitigation.
9.) The Plan and EIR have failed to make reasonable accommodations that would mitigate the profound impact of such a development over time that will ***forever*** change the character of Squaw Valley.

County of Placer
Placer County Planning Commission
August 8, 2016
Page 4

THE CURRENT VILLAGE DEVELOPMENT TOGETHER WITH EXPANDED USE OF THE VALLEY HAS ALREADY CREATED EXCESSIVE TRAFFIC IN WINTER MONTHS

We have experienced first-hand the impact on our small development in attempting to drive or catch a shuttle to the West end of the Valley during peak winter traffic periods. It has often taken as much as ½ hour just to drive the short 2 mile trip to the West end of the Valley. The hazards in delayed fire protection, emergency medical vehicles and peace officer protection at peak and even "new normal" traffic periods is obvious and too great. No amount of so-called planning can adequately address this issue – it requires fundamental infrastructure changes if more traffic will be permitted by the Plan

16-2

DANGEROUS INTERSECTION AT SQUAW VALLEY ROAD AND ENTRANCE TO SQUAW CREEK RESORT – AND ACCESS TO SQUAW RIDGE

The Plan virtually ignores the planned development of a significant number of additional units at both the Village AND at the Resort at Squaw Creek that will make the intersection at the corner of Squaw Creek and Squaw Valley Roads even more dangerous. This is the sole access for ingress and egress for Squaw Ridge. It is currently virtually impossible to make to make a left turn from Squaw Creek Road onto Squaw Valley Road in peak traffic periods during the winter. Thousands of cars entering and leaving the ski area in the morning and afternoon simply do not provide sufficient space to safely make a left turn. This condition will only become worse as the additional employees housed in the Valley, the additional residents in the Village and tourists coming to and from the Valley add to this traffic load. We also note that the current configuration of the bike path that crosses this intersection near our homes has also been virtually ignored and will, without serious planning and action, result in injury or death to a bike rider. The intersection and bike path crossing are not adequately addressed in the Plan and in the future for Squaw Valley.

CONCLUSION

As proof that the Plan does not adequately address the many-many shortfalls in CEQA and commons sense development requirements, the Planning Department has indicated that it will ask for the approval of a "***Statement of Overriding Consideration***" from the Board of Supervisors, the "lead agency." This is true, because "*When the agency (lead agency) decides to approve a project that will cause one or more significant environmental effects, the lead agency shall prepare a statement of overriding considerations which reflects the ultimate balancing of competing public objects (including environmental, legal, technical, social and economic factors*[2]*.*" It is obvious that the Plan does not meet reliable CEQA compliance considerations, or no such Statement of Overriding Considerations would even be considered. It is also obvious that the Developer knows this fact and has attempted to "load up" on so-called experts and planners to justify the Plan.

The Developer has admitted that profound significant environmental effects are not adequately mitigated in its own EIR (See Appendix 1). Thus, it is unnecessary to demonstrate that the mitigation efforts are inadequate – the Developer has already admitted this fact.

Yours Truly,

H. James Wulfsberg

[2] *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212: Court held that a statement of overriding considerations must be supported by substantial evidence in the record or contained in the final EIR.
Resources Defense Fund v. Local Agency Formation Commission of Santa Cruz County (1987) 191 Cal.App.3d 886: Appellate court reversed trial court's decision and held that failure by Commission to prepare a written finding stating reasons for infeasibility of alternatives and failure to prepare an adequate statement of overriding considerations was more than a "harmless error".
Laurel Hills Homeowners' Ass'n. v. City Council (1978) 83 Cal.App.3d 515: Court suggested that an impact can be substantially lessened but still remain significant.

APPENDIX 1.

2.2.1 Significant and Unavoidable Environmental Impacts

Implementation of the proposed Specific Plan would result in the following significant unavoidable environmental impacts, following implementation of feasible mitigation measures:

Cultural Resources

- Impact 7-1: Demolition of historically significant buildings

Visual Resources

- Impact 8-1: Adverse effect on a scenic vista (construction and operations as experienced by long-term residents)
- Impact 8-2: Substantially degrade the existing visual character or quality of the site and its surroundings (construction)
- Impact 8-3: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway (construction)
- Impact 8-5: Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (operations)

Transportation and Circulation

- Impact 9-2: Impacts to Placer County intersections
- Impact 9-3: Impacts to Caltrans intersections
- Impact 9-4: Impacts caused by vehicular queuing at Caltrans intersections
- Impact 9-5: Impacts to Caltrans highways

Noise

- Impact 11-1: Construction noise impacts
- Impact 11-5: Exposure of new and existing sensitive receptors to operational project-generated transportation noise sources (potentially significant for existing sensitive receptors)

Greenhouse Gases and Climate Change

- Impact 16-2: Operational greenhouse gas emissions (potentially significant after 2020)

Cumulative Impacts

- Impact 18-12: Cumulative effect on historical resources
- Impact 18-14: Substantial adverse cumulative effect on a scenic vista
- Impact 18-15: Substantial contribution to the cumulative degradation of the existing visual character or quality of the site and its surroundings
- Impact 18-16: Substantial cumulative contribution to damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a scenic highway
- Impact 18-18: Contribute to cumulative light and glare or skyglow effects in the region
- Impact 18-21: Cumulative impacts to Caltrans intersections
- Impact 18-22: Cumulative impacts caused by vehicular queuing at Caltrans intersections
- Impact 18-23: Cumulative impacts to Caltrans highways
- Impact 18-31: Cumulative short-term construction-generated noise
- Impact 18-32: Cumulative long-term ambient noise levels
- Impact 18-43: Cumulative greenhouse gas emissions

I8 H. James Wulfsberg
August 8, 2016

I8-1 The comment expresses concern and objection to the scope, nature, and extent of the proposed Specific Plan. The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the DEIR or FEIR. The Placer County Board of Supervisors will take the commenter's opinions into consideration when making decisions regarding the project. Regarding the comment that Squaw Ridge was not consulted about the project, see Section 1.7 "Project Review and CEQA Process," of the DEIR and multiple responses to comments in the FEIR that detail the extensive public outreach conducted for this project.

Regarding the comment that the project is so deficient to require a statement of overriding considerations, see response to comment I8-3, below, which explains in detail why the mere act of issuing a statement of overriding conditions does not signify that that the project or EIR do not meet CEQA requirements, as stated by the comment.

The remainder of the comment summarizes the commenter's perceived deficiencies or disagreement with conclusions in the project and EIR related to topics such as traffic, emergency access, traffic hazards, aesthetics (including shadowing), availability of groundwater, inadequate mitigation resulting in a need for a statement of overriding considerations, and changes in the character of Squaw Valley. These issues have been addressed in the DEIR and in the FEIR. No new questions or issues not already addressed in the DEIR or FEIR pertaining to the environmental analysis are raised in this comment. Therefore, no further response is provided.

I8-2 The comment states that the project would exacerbate existing traffic issues during peak winter traffic periods. In particular, the comment notes the resulting effect on fire protection, emergency medical vehicles, and police protection. These issues are addressed in the DEIR (see Chapters 9, "Transportation and Circulation," and 14, "Public Services and Utilities") and the FEIR (see the Master Response regarding traffic). See, in particular, Impacts 14-7 and 14-8, which discuss the potential for increased demand for fire protection, emergency medical services, and sheriff/police services. Mitigation is recommended where applicable. In particular, Mitigation Measure 14-7a requires that a Construction Traffic Management Plan be developed and implemented to maintain emergency vehicle access on area roadways. The comment states that no amount of planning can adequately address this issue, but does not provide specifics indicating why the recommended mitigation is not adequate. Therefore, no further response can be provided.

In particular, the comment expresses concern about the intersection of Squaw Valley Road and Squaw Creek Road, which provides access to the Squaw Ridge development. This intersection was included in the study area evaluated in Chapter 9, "Transportation and Circulation," of the DEIR. In particular, see Impact 9-2, which discusses potential impacts to Placer County intersections, including the Squaw Valley Road/Squaw Creek Road intersection. Mitigation Measures 9-2c and 9-2d pertain specifically to this intersection and require the project applicant to conduct traffic management during the ski season and summer season, respectively. The DEIR concluded (see page 9-59) that this intersection would operate at LOS C or better with traffic management.

Regarding the comment that the project virtually ignores the planned development of a significant number of units both at the Village and at the Resort at Squaw Creek that will make the Squaw Valley Road/Squaw Creek Road intersection more dangerous, this issue is

addressed in the DEIR. See Section 18.1, "Cumulative Impacts," and Table 18-2 in particular, which lists the Olympic Valley cumulative projections to 2039. These projections informed the analysis of cumulative traffic impacts. See Impact 18-20, which discusses potential cumulative impacts to Placer County intersections, including the Squaw Valley Road/Squaw Creek Road intersection. Mitigation Measure 18-20 requires the project applicant to conduct traffic management along Squaw Valley Road. The DEIR concluded (see pages 18-23 and 18-24) that this intersection would operate at LOS C or better with traffic management, under cumulative conditions.

Regarding the concern about the existing bike path at this intersection, this issue has been addressed in the DEIR and FEIR. See, in particular, Impact 9-6 in the DEIR that discusses potential impacts to bicycle and pedestrian facilities.

While the comment states that the intersection and bike path crossings are not adequately addressed in the project, it does not provide specifics as to why the DEIR or FEIR is inadequate. Therefore, a further response is not provided.

I8-3 The comment is correct in that if the Placer County Board of Supervisors approves the project, it will also prepare findings and issue a statement of overriding conditions for all impacts identified as significant and unavoidable. This is a CEQA requirement and is explained on page 1-1 of the DEIR as follows,

> CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; CCR Section 15093).

The mere act of issuing a statement of overriding conditions does not, however, signify that that the project or EIR do not meet CEQA requirements, as stated by the comment. As described above, issuing a statement of overriding considerations is a requirement of CEQA, with which the project would comply. Further, issuing such a statement is a common practice as part of environmental review, especially for large development projects. As stated by the commenter, it "reflects the ultimate balancing of competing public objects (including environmental, legal, technical, social and economic factors." This is the Placer County Board of Supervisors' responsibility as the elected decision-making body of the County.

The commenter's statement that "the developer has admitted that profound significant environmental effects are not adequately mitigated in the EIR" is incorrect. As explained above, the presence of significant and unavoidable impacts does not signify that mitigation measures are inadequate. Rather, as explained in Section 18.2, "Significant Environmental Effects which Cannot be Avoided," of the DEIR, a significant and unavoidable impact results when there is no feasible mitigation available to reduce the impact to a less-than-significant level. Section 18.2 of the DEIR explains why each impact was identified as significant and unavoidable. Also see the Master Response in the FEIR related to Significant and Unavoidable Impacts.

19

August 8, 2016

To: Placer County Planning Commission

From: John Moise
1466 Beaver Dam Trail
Alpine Meadows, CA 96146

Subject: Opposition to Village at Squaw Valley, public safety concerns

Since 1986 I have owned a home in Alpine Meadows and have been involved with issues related to fire safety and public safety in the mountain environment. As homeowners we strive to have a safe community for all to enjoy and also have access to appropriate emergency services, which we support with our tax dollars.

19-1

Over the last several years highway 89, from Truckee to Tahoe City has become increasingly congested during weekends and popular vacation periods. For us and those in Squaw Valley this 2-lane highway is the only route to the hospital in Truckee. On ski weekends it is not uncommon for what is typically a 15-minute drive to Truckee to take 90-120 or more minutes. Simply stated for public safety on the busy weekends and holidays, of which there are many the road needs to have at least 4 or more lanes to allow traffic to flow adequately.

While this is inconvenient for everyone who is on the road, far more importantly it precludes emergency vehicles, ambulances and police cars from performing their task of keeping the public safe. We now have a public safety danger, and those needing emergency treatment cannot get to a hospital in a timely manner. If you are having a stroke it is imperative to get to an Emergency room and begin treatment in less than 30 minutes. Due to the limited capacity of highway 89 that time cannot be achieved during many times of the year. If the proposal for the expansion of the Village at Squaw Valley was to be approved an already dangerous traffic delay will become much much worse.

I urge you to reject the proposal and require a resubmission that addresses this truly dangerous situation.

Thank you

Kathi Heckert

From: Shirlee Herrington
Sent: Monday, August 08, 2016 3:53 PM
To: Kathi Heckert
Cc: Alexander Fisch; Paul Thompson; EJ Ivaldi
Subject: Letter for the 8/11 planning commission meeting
Attachments: Placer county planning commission.docx

FYI

Thank you,
Shirlee

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
530-745-3132
sherring@placer.ca.gov

-----Original Message-----
From: John Moise [mailto:jmoise@yahoo.com]
Sent: Monday, August 08, 2016 3:20 PM
To: Shirlee Herrington
Subject: Letter for the 8/11 planning commission meeting

Hi Shirley,

I have attached a letter to the commission. Thank you for getting it to the commissioners prior to the 8/11 meeting.

John Moise
1466 Beaver Dam Trail
Alpine Meadows, CA
96146

1

I9 John Moise
August 8, 2016

I9-1 The comment expresses concern about existing traffic and resulting safety concerns on State Route (SR) 89, especially on busy weekends and holidays. This issue is addressed in the DEIR (see Chapter 9, "Transportation and Circulation") and the FEIR (see the Master Response regarding traffic). See, in particular, Impacts 9-3, 9-4, and 9-5, which discuss potential impacts to Caltrans facilities, including SR 89. Mitigation is recommended where applicable; however, some impacts were determined to be significant and unavoidable even after mitigation, including along some segments of SR 89. The Placer County Planning Commission and Board of Supervisors will consider this issue during project deliberations, and, if the project is approved, will prepare findings and issue a statement of overriding conditions for all impacts identified as significant and unavoidable. This statement of overriding considerations will explain the specific economic, social, or other considerations that the County believes, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; CCR Section 15093).

Regarding the comment that State Route 89 should be expanded to at least four lanes, this issue was addressed in the DEIR (see page 9-27) and described as infeasible as follows,

> Within the study area, the *Transportation Corridor Concept Report, State Route 89* (Caltrans 2012b) establishes a LOS E concept level of service for the 13-mile segment between SR 28 and the Placer/Nevada County line. The TCCR acknowledges that expanding this segment is not feasible due to the environmental sensitivity of the area and topographic constraints. Thus, the existing two-lane conventional highway is not planned for any modifications, aside from pavement rehabilitation. For the 0.5-mile segment between the Placer/Nevada County line and I-80, the TCCR identifies a 20-year concept LOS E based on its widening to a four-lane conventional highway. It identifies a 20-year no build LOS F if no improvements are made. The segment of SR 89 south of Tahoe City also has a concept LOS E with widening not feasible due to the environmental sensitivity of the area and topographic constraints.

An alternative involving widening Squaw Valley Road from two to four lanes to accommodate the increased traffic that would be generated by the project was described and evaluated in the DEIR (see Section 17.3.5, "Widened Squaw Valley Road Alternative").

Regarding the comment that the increased traffic from the project would preclude emergency vehicles, ambulances, and police cars from keeping the public safe, this issue is addressed in the DEIR (see Chapters 9, "Transportation and Circulation," and 14, "Public Services and Utilities") and the FEIR (see the portion of the traffic Master Response that addresses emergency vehicle access/wildland fire evacuation plan). See, in particular, Impacts 14-7 and 14-8, which discuss the potential for increased demand for fire protection, emergency medical services, and sheriff/police services. Mitigation is recommended where applicable. In particular, Mitigation Measure 14-7a requires that a Construction Traffic Management Plan be developed and implemented to maintain emergency vehicle access on area roadways.

The remainder of the comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the DEIR or FEIR. Therefore, no further response is provided here. The Placer County Board of Supervisors will consider this issue during project deliberations.

TRANSPORTATION PLANNING AND
TRAFFIC ENGINEERING CONSULTANTS

2690 Lake Forest Road, Suite C
Post Office Box 5875
Tahoe City, California 96145
(530) 583-4053 FAX: (530) 583-5966
info@lsctahoe.com
www.lsctrans.com

MEMORANDUM

To: Jennifer Merchant, Placer County

From: Gordon Shaw, PE, AICP, LSC Transportation Consultants, Inc.

Date: April 4, 2016

RE: Developer Funding Allocation Scenario for TART Service Enhancements

Per your request, this memo presents a scenario for allocation of annual TART service expansion costs to two major proposed developments: The Village at Squaw Valley, and Martis Valley West.

First, a forecast of the annual operating budget shortfall was identified, reflecting the following:

- Expansion of TART services to include 30-minute service frequency during daytime periods systemwide (including service to Truckee on the 89 Route and 267 Route) during the summer and winter season.
- Improvements in evening service during the summer and winter seasons (coordinating the schedule with daytime services) as well as new provision of evening service in the off-seasons until approximately 9:30 PM.
- Elimination of direct passenger fares for daytime service (evening service is already provided at no fare).
- Additional annual operating funding resulting from the new ability of the Tahoe Region to obtain Federal Transit Administration 5307 Urban Operating funds.

The resulting annual operating subsidy shortfall is estimated to equal $2,076,800. This figure is in FY 2020/21 dollars (assuming a 1.8 percent rate of inflation from current costs). It does not assume revenues from a potential new countywide sales tax.

An allocation proportion for each of the two projects was identified as shown in the attached table:

- PM peak-hour volumes were identified from the two Draft EIR documents for future cumulative-plus-project (buildout) conditions, as well as for the project-specific volumes

at the two highway locations entering the Tahoe Basin from the remainder of Placer County (SR 89 just south of Alpine Meadows Road, and SR 267 at Brockway Summit).

- To provide an overall annual picture of traffic impacts, the summer and winter PM peak-hours were averaged.

- The proportion of total future traffic volume entering/exiting the Tahoe Region generated by each project was then calculated. This figure was found to be 4.7 percent for the Village at Squaw Valley and 3.3 percent for Martis Valley West.

- These proportions were then multiplied by the total unfunded transit expansion annual operating cost to identify an allocation of $97,500 for the Village at Squaw Valley and $68,000 for Martis Valley West.

Allocation of Unfunded TART Expansion Operating Costs

Based upon Proportion of Total Future Traffic Volume at Tahoe Basin Boundary

	Total 2-Way Hourly Traffic Volume				
	Summer	Winter	Average		Source
TOTAL UNFUNDED TRANSIT EXPANSION ANNUAL OPERATING COSTS				**$2,076,800**	
Cumulative-Plus-Project PM Peak-Hour Volume					
SR 89 South of Alpine Meadows Road	1,666	1,372	1,519		VSV DEIR, Exhibit 18-3
SR 267 at Brockway Summit	1,752	1,772	1,762		MVWSP DEIR, Exhibit 10-9
Total (Both Boundary Points)	3,418	3,144	3,281		
Total Growth (Both Boundary Points)	1,038	730	884		
Village at Squaw Valley Project-Only PM Peak-Hour Volume at Buildout					
SR 89 South of Alpine Meadows Road	246	62	154		VSV DEIR, Exhibit 9-10
Percent of Total Boundary PM Peak-Hour Volume	7.2%	2.0%	4.7%		
Allocated Unfunded Annual Costs Based on Average Percent of Total Boundary Volume				**$97,500**	
Martis Valley West Project-Only PM Peak-Hour Volume at Buildout					
SR 267 at Brockway Summit	114	101	108		MVWSP DEIR, Exhibit 10-6
Percent of Total Boundary PM Peak-Hour Volume	3.3%	3.2%	3.3%		
Allocated Unfunded Annual Costs Based on Average Percent of Total Boundary Volume				**$68,000**	

Does not include potential local option sales tax revenues.