

TAHOE-TRUCKEE SANITATION AGENCY



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VIA U.S. MAIL AND E-MAIL

16 July 2015

Ms. Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

RE: Village at Squaw Valley Specific Plan Project DEIR Comments

Dear Ms. Krach:

The Tahoe-Truckee Sanitation Agency (T-TSA) provides the following comments to Placer County on the Draft Environmental Impact Report (DEIR) for the Village at Squaw Valley Specific Plan (VSVSP) Project (Project).

T-TSA provides regional wastewater treatment service to several Tahoe & Truckee area communities in portions of El Dorado, Placer, and Nevada counties through the Agency's five member sewage collection districts - the North Tahoe Public Utility District, the Tahoe City Public Utility District, the Alpine Springs County Water District, the Squaw Valley Public Service District (SVPSD), and the Truckee Sanitary District (TSD). The TSD also serves the Northstar Community Services District (NCSD) by way of an agreement. T-TSA owns, operates and maintains the Truckee River Interceptor (TRI), a main trunk line for raw sewage conveyance, and the regional Water Reclamation Plant (WRP), both of which are described in more detail below.

The 17-mile long TRI pipeline runs along the Truckee River corridor between Tahoe City and the WRP in Truckee. The interceptor flows exclusively by gravity and varies in size from 24- to 42-inches in diameter. The interceptor conveys all of the untreated, raw sewage collected from the northern and western shores of Lake Tahoe, Alpine Meadows, Squaw Valley, and Truckee. Wastewater from the Northstar development is conveyed to T-TSA via an export agreement between NCSD and TSD.

The WRP regional facility is designed to treat and dispose of the sewage delivered by the TRI. Through a series of biological, chemical and physical processes, the wastewater is purified to a degree where surface and ground water quality is protected. Wastewater flow to the facility varies in quantity and quality in proportion to the population present during the year. The WRP

is principally sized to treat the maximum sewage flows that occur during peak holiday periods with the large influx of seasonal residents and visitors. The capacity of the WRP is 9.6 million gallons per day (mgd) on a maximum 7-day average flow basis during the summer months.

T-TSA has reviewed the DEIR, and other available Project information, and offers the following comments:

1. **Peak Wet Weather Flows:** As accurately described in Impact No. 14-2 on Page 2-81 of the DEIR, T-TSA does not currently have capacity in the Truckee River Interceptor (TRI) to serve both existing customers and the expected wastewater flows generated by the proposed Project during peak wet weather flow periods. The capacity of the TRI may be exceeded at these times. As described on Page 3-25 of the DEIR, T-TSA is currently studying, as a separate action, the possibility of upsizing and replacing certain sections of the TRI to address some of the system's existing hydraulic bottlenecks.
2. **T-TSA Fixture Counts:** The DEIR lacks the finalized fixture counts and other T-TSA billing factors counts that we had requested be included for the overall Project. Please provide these fixture counts for all aspects of the development including all residential and commercial developments, hotel & conference facilities, restaurants, skier services, mountain operations and maintenance facilities, snow-making facilities, employee housing units, the Mountain Adventure Camp, other recreational and resort-based facilities and any other development features that would generate wastewater flows.
3. **Characterization of Housing Units:** With respect to the number of units and bedrooms provided for the various types of accommodations to be constructed (e.g., hotels, condo hotels, fractional ownership, timeshare units, cabins, etc.) referred to throughout the DEIR, please further characterize any lock-off units per our previous requests and verify that they would not include kitchen sinks (sinks with dimensions 15-inches by 15-inches by 7-inches deep, or greater) or cooking facilities (microwaves, ovens, stovetops, or any other cooking facilities).
4. **Peak Instantaneous Backwash and Drainage - Water Quality and Discharge Flowrates:** The DEIR lacks information on anticipated water quality and peak instantaneous flowrates that would be discharged to the sanitary sewer system from the Mountain Adventure Camp, pools, hot tubs, spas, and the like for the entire development. Does the applicant still intend on constructing flow equalization facilities for these specific development features to minimize the impacts of large instantaneous discharges as had been discussed in various planning meetings? Please provide all of this finalized information, including water quality characteristics, peak instantaneous backwash flowrates, durations, and timing of all discharges to the sewer system in order to assist the Agency in determining the demands imparted on its systems from these amenities.
5. **TRI Capacity:** The information from the cited reference shown in the last paragraph of Section 14.1.2 on Page 14-8 was obtained from old survey information for other projects that was later determined to be incorrect. As such, T-TSA had multiple conversations with VSVSP Project staff in 2012, where T-TSA staff had reiterated that more information needed to be gathered and evaluated before the remaining capacity of the

TRI could be accurately quantified - a proper survey of the entire TRI needed to be performed and a hydraulic model developed prior to assessing remaining capacities in T-TSA's facilities for the VSVSP Project and the cumulative effects of other projects. VSVSP Project staff had been informed that these follow-up analyses could only be performed after T-TSA had received detailed information about the total potential sewage flows to be generated by the Project. As accurately portrayed in other sections of the DEIR, it has since been determined that there currently is inadequate capacity in the TRI to serve the both existing customers and expected flows generated by the proposed Project during peak wet weather flow events. As described above, T-TSA is currently studying, as a separate action, the possibility of upsizing and replacing certain sections of the TRI to address some of the system's existing hydraulic bottlenecks.

6. **WRP Capacity:** The paragraph beginning with "The SVPSD owns and operates..." on Page 14-36 contains inaccurate, outdated information on remaining capacities at the WRP. Although there currently appears to be sufficient capacity at the WRP to serve projects as large as the VSVSP Project, all capacity allocations are made on a first-come, first-serve basis for all customers and projects within T-TSA's service area. T-TSA does not reserve capacity for specific Projects and does not issue Will Serve letters as suggested by this paragraph.

T-TSA would like to thank Placer County for the opportunity to provide these comments. We look forward to reviewing how our concerns are addressed. If you have any questions or concerns, please do not hesitate to contact me at (530) 587-2525.

Sincerely,



LaRue Griffin
General Manager/Treasurer

c: Jay Parker, T-TSA
Tom Rinne, T-TSA
Mike Geary, SVPSD