



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT
1325 J STREET
SACRAMENTO CA 95814-2922

June 12, 2015

Regulatory Division SPK-2012-00582

Placer County Community Resource Agency
Environmental Coordination Services
Attn: Ms. Maywan Krach
3091 County Center Drive, Suite 190
Auburn, California 95603

Dear Ms. Krach:

We are responding to your May 26, 2015 request for comments on the proposed Village at Squaw Valley Specific Plan project (PSPA 20110385 and State Clearinghouse 012102023). The proposed project is an approximately 85 acre mixed-use development that includes resort, residential (including employee housing), commercial, and recreation uses, as well as parking and other visitor amenities. The project is located in Section 32, Township 16 North, Range 16 East, Mount Diablo Meridian, Latitude 39.19729°, Longitude -120.23463°, Olymptic Valley, Placer County, California.

The Corps of Engineers' jurisdiction within the study area is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States. Waters of the U.S. include, but are not limited to, rivers, perennial or intermittent streams, lakes, ponds, wetlands, vernal pools, marshes, wet meadows, and seeps. Project features that result in the discharge of dredged or fill material into waters of the U.S., including wetlands, will require Department of the Army authorization prior to starting work in waters of the U.S.

Based on the proposed Exhibit 13-5, entitled *Wetland Delineation Map Showing Waters of the U.S. in the Main Village Area*, it appears there may be jurisdictional wetlands and other waters present within the proposed study area. To ascertain the extent of waters of the U.S. on the project site, the applicant should prepare a wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetlands Delineations" and "Final Map and Drawing Standards for the South Pacific Division Regulatory Program" and submit it to this office for verification.

Additionally, as found in Section 3.1 Project Location and seen in Exhibit 3-3 of the EIR, the plan area encompasses a total of approximately 94 acres including approximately 85 acres in the main Village area on the west side of the valley and an approximately 8.8-acre area referred to as the East Parcel, located approximately 1.3 miles east of the main Village area and 0.3 mile west of the intersection of SR 89 and Squaw Valley Road. In order to meet the minimum standards for acceptance of wetland

delineations, the additional 8.8 acres not seen in Exhibit 13-5 should be included in the wetland delineation map in order to ascertain whether there are/are not potential wetland and/or other waters of the U.S. within the study area.

The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands and other waters of the U.S. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the U.S. No discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge, which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. When considering practicability, the Guidelines define a practicable alternative as one that *is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes* [refer to 40 C.F.R. § 230.3(q)].

Based on our regulations and policies, the Corps places high degrees of importance on the functional losses either directly or indirectly caused by the discharge of dredged or fill material into waters of the U.S., including wetlands. Therefore, to the extent practicable, the EIR should quantitatively and/or qualitatively address the anticipated direct and indirect effects to aquatic resource functions and services in terms of sedimentation (e.g., sediment transport, accretion, aggradation, degradation, erosion, hydrologic regime, water quality, floodplain encroachment, and habitat integrity). In the event it can be clearly demonstrated there are no practicable alternatives that avoid adverse impacts to aquatic resources, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation.

Furthermore, in our DA permit evaluation process, the Corps must balance the project purpose against the public interest. The public benefits and detriments of all factors relevant to this project will be carefully reviewed and considered. Relevant factors may include, but are not limited to, conservation, economics, aesthetics, wetlands, cultural values, fish and wildlife values, water quality, and any other factors judged to be important to the needs and welfare of the people. The following general criteria must be considered by the Corps in evaluating a DA permit application:

- The relevant extent of public and private needs;
- Where unresolved conflicts of resource use exist, the practicability of using reasonable alternative locations and methods to accomplish project purposes; and
- The extent and permanence of the beneficial and/or detrimental effects the proposed project may have on the public and private uses to which the area is suited.

No DA permit can be granted if the project is found to be contrary to the public interest.

Please refer to identification number SPK-2012-00582 in any correspondence concerning this project. If you have any questions, please contact me at our California North Branch Office, Regulatory Division, U.S. Army Corps of Engineers, 1325 J Street, Room 1350, Sacramento, California 95814-2922, by email at *Leah.M.Fisher@usace.army.mil*, or telephone at 916-557-6639. For more information regarding our program, please visit our website at *www.spk.usace.army.mil/Missions/Regulatory.aspx*.

Sincerely,

A handwritten signature in black ink, appearing to read "Leah M. Fisher". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Leah M. Fisher
Senior Project Manager
California North Branch
Regulatory Division