Alpine Sierra Subdivision
Final Environmental Impact Report
(SCH#2014042028)

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CHAPTER 1
INTRODUCTION

This Final Environmental Impact Report (EIR) contains the public and agency comments received during the public review period for the Alpine Sierra Subdivision (proposed project), and the responses to each of those comments. It also includes those pages from the Draft EIR that have been revised in response to the comments.

The EIR is an informational document intended to disclose the environmental consequences that would result if the proposed project or one of the alternatives is approved and implemented. All written comments received on the Draft EIR during the public review period (September 19, 2017 through November 3, 2017) are addressed in this Final EIR.

1.1 CEQA REQUIREMENTS

Under the California Environmental Quality Act (CEQA), the lead agency must prepare and certify a Final EIR prior to a proposed project being approved. This Final EIR was prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.). CEQA Guidelines Section 15132 states that the Final EIR shall consist of the following:

- The Draft EIR or a revision of the Draft
- Comments and recommendations received on the Draft EIR, either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The lead agency's responses to significant environmental points raised in the review and consultation process
- Any other information added by the lead agency

The lead agency (for this project, Placer County (County)) must provide each agency that commented on the Draft EIR with a copy of the lead agency's responses to those comments within a minimum of 10 days before certifying the Final EIR. The Final EIR allows commenting agencies and the public an opportunity to review revisions to the Draft EIR and the responses to comments.

This Alpine Sierra Subdivision EIR serves to inform the County's consideration of the proposed project. This EIR includes evaluation of two project alternatives at an equal level of detail: Alternative A – the applicant's originally proposed project, and Alternative B, which was developed to reduce some of the impacts of Alternative A. The EIR also includes analysis of other alternatives to the proposed project, which are discussed in the Draft EIR (Chapter 16, CEQA Considerations).

This Final EIR provides responses to all comments received on the Draft EIR. The responses clarify, correct, and/or amplify text in the Draft EIR, as appropriate. Chapter 2 begins with a set of Master Responses that address issues raised in numerous comment letters received on the Draft EIR as well as individual responses to comments. The Master Responses were developed to provide comprehensive responses to address specific topics and impact analyses that received similar or repeated comments from multiple commenters during the Draft EIR public comment period. The Final EIR also includes text changes made to the Draft EIR either in response to comments or at the initiative of the County. These changes are summarized in Table 1-2 (see Section 1.4, Summary of Draft EIR Text Changes), identified in the Master Responses and responses to comments in Chapter 2 and shown in strikeout/underline format in Chapter 3, Text Changes to the Draft EIR. The revisions to the Draft EIR text do not alter the conclusions of the Draft EIR. Chapter 4 of the Final EIR presents the Mitigation Monitoring and Reporting Program for the project. A list of references cited in the Final EIR is provided in Chapter 5, and a list of EIR Preparers is provided in Chapter 6.

1.2 CERTIFICATION OF THE FINAL EIR

The comments and responses that make up the Final EIR, in combination with the Draft EIR as amended by the text changes shown in this document, constitute the EIR that will be considered for certification by the County's decision-makers. As required by Section 15090(a)(1)–(3) of the CEQA Guidelines, in certifying a Final EIR, a lead agency must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA;
2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding, supported by substantial evidence in the record. The possible findings are as follows:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (14 CCR 15091).

The Findings of Fact are included in a separate document that will be considered for adoption by the County's decision makers at the time of project approval. The Draft EIR finds that project would not result in any significant and unavoidable impacts, therefore a Statement of Overriding Considerations is not required.

1.3 RESPONSE TO COMMENTS

A total of 40 comment letters were received and each letter and response is included in Chapter 3, as listed below in Table 1-1. Each comment letter is numbered and presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the number of the comment letter appearing first, followed by the comment number. For example, the single comment in Letter A1 is numbered A1-1. In addition, verbal comments received at the Planning Commission hearing on October 26, 2017 are summarized and responded to at the end of Chapter 2. Responses to comments are presented following the letters, each with binomials that correspond to the bracketed comments. As the subject matter of one topic may overlap between letters, the reader may need to refer to one or more responses to review all the information on a given subject. To assist the reader, cross-references to other comments are provided. In addition, master responses have been prepared to address issues or concerns that were raised in multiple comments. The master responses precede the comment letters and, where applicable, the individual responses to comments refer the reader back to the applicable master response(s). The focus of the responses to comments is on the disposition of significant environmental issues raised in the comments, as specified by Section 15088(c) of the CEQA Guidelines. Comments have been reviewed, analyzed, and evaluated, and substantive comments on the Draft EIR have been given a response. When a comment does not address significant environmental issues and does not raise specific issues related to the adequacy of the environmental analysis, the response indicates that no further response is necessary.

Table 1-1
Index of Commenters on the Draft Environmental Impact Report

Comment Letter	Date of Letter	Commenter	Response Nos.
A. Federal Agencies			
A1	October 17, 2017	Ian Vogel, U.S. Fish and Wildlife Service	A1-1
B. State Agencies			
B1	November 3, 2017	Office of Planning and Research, State Clearinghouse	B1-1
C. Local Agencies			
C1	October 18, 2017	Jason A. Parker, Tahoe-Truckee Sanitation Agency	C1-1 to C1-3
C2	November 6, 2017	Brad Brewer, Placer County Flood Control and Water Conservation District	C2-1
D. Native American Tribes			
D1	October 17, 2017	Gene Whitehouse, United Auburn Indian Community	D1-1
E. Organizations			
E1	October 25, 2015	Lisa Wallace and Eben Swain, Truckee River Watershed Council	E1-1 to E1-8
E2	October 25, 2017	Susan Gearhart and Jennifer Quashnick, Friends of the West Shore	E2-1 to E2-6
E3	November 3, 2017	Jason Flanders, ATA Law Group, on behalf of Bear Creek Association	E3-1 to E3-36
F. Individuals			
F1	September 24, 2017	Steve Anderson	F1-1 to F1-2
F2	October 21, 2017	Steve Anderson	F2-1
F3	October 29, 2017	Rachelle Latimer	F3-1 to F3-19
F4	October 30, 2017	Judy Bruner	F4-1 to F4-26
F5	October 30, 2017	David Taylor	F5-1
F6	October 30, 2017	Billy Volkmann	F6-1 to F6-15
F7	October 31, 2017	David Anhalt	F7-1 to F7-18
F8	October 31, 2017	Jerry Cahill	F8-1 to F8-3
F9	October 31, 2017	Donald L. Jones	F9-1
F10	October 31, 2017	Sharla Menlove Chador	F10-1 to F10-16
F11	October 31, 2017	Keri Tully	F11-1 to F11-18
F12	November 1, 2017	Robert H. Cole	F12-1 to F12-15
F13	November 1, 2017	Daniel D. Heagerty	F13-1 to F13-22
F14	November 1, 2017	Lauren Ross	F14-1 to F14-7
F15	November 1, 2017	Ann Van Ess	F15-1 to F15-19
F16	November 2, 2017	Elaine Geffen	F16-1 to F16-9
F17	November 2, 2017	Dr. Katherine Hover-Smoot	TBD
F18	November 3, 2017	Jennifer Absey	F18-1 to F18-12
F19	November 3, 2017	Dean Amundson	F19-1 to F19-25
F20	November 3, 2017	Ryan Carlson and Melissa Winn	F20-1 to F20-15
F21	November 3, 2017	Elise Duncan	F21-1 to F21-4
F22	November 3, 2017	Pete Geffen	F22-1 to F22-2

Table 1-1
Index of Commenters on the Draft Environmental Impact Report

Comment Letter	Date of Letter	Commenter	Response Nos.
F23	November 3, 2017	Andrew Hays	F23-1 to F23-7
F24	November 3, 2017	Leo E. Heagerty	F24-1 to F24-5
F25	November 3, 2017	Aramie and Kevin McDonald	F25-1 to F25-3
F26	November 3, 2017	John Moise	F26-1 to F26-13
F27	No Date	Andrew Branagh	F27-1 to F27-5
F28	No Date	Michael Nashner	F28-1 to F28-6
F29	No Date	George Sauter and Susan Biddle	F29-1 to F29-14
F30	No Date	Ernest Wertheim	F30-1 to F30-22
F31	No Date	Annie Yates and John Dawes	F31-1 to F31-18
F32	No Date	Griffith Tully	F32-1 to F32-18
PC. Comments Received at the Planning Commission			
PC	October 26, 2017	Various	PC-1 to PC-53

1.4 SUMMARY OF DRAFT EIR TEXT CHANGES

Table 1-2 identifies all changes made to the Draft EIR. These text changes provide additional clarification for the responses to comments received on the Draft EIR and identify revisions and supplemental information added to the EIR appendices. The text changes do not change the conclusions presented in the Draft EIR regarding the significance of the proposed project's environmental impacts. The pages from the Draft EIR on which text revisions were made are included in this Final EIR (Chapter 4). Upon certification of the Final EIR by the County, the Draft EIR, as revised, will be reprinted in whole and posted to the County's website.

Table 1-2
Summary of Draft EIR Text Changes

Draft EIR Page No.	Revised Draft EIR Page No.*	Text Revision Made
2-9	2-9	Correct text identifying whether the project would result in significant and unavoidable impacts
2-11	2-11	Correct Mitigation Measure 5.1c – change "Implementation" to "Improvement"
2-12	2-12	Add specification for LED lighting to Mitigation Measure 5.3a
2-13	2-13 through 2-15	Add Mitigation Measure 6.1c regarding yellow-legged frog
2-13	2-16	Add specifications to Mitigation Measure 6.2b
2-15	2-17	Omit "vernal pools" from Mitigation Measure 6.4a
2-15	2-17	Correct text identifying the determination of Mitigation Measure 6.4b

Table 1-2
Summary of Draft EIR Text Changes

Draft EIR Page No.	Revised Draft EIR Page No.*	Text Revision Made
2-17	2-19	Correct text in Mitigation Measure 6.7a – change "issuance" to "approval"
2-30	2-32	Correct text in Mitigation Measure 12.4b – change "Department" to "Division"
2-31	2-33 through 2-34	Revise Mitigation Measure 13.1c to match the text of this measure in Chapter 13
2-36	2-39	Clarify text in Mitigation Measure 15.7a
3-10	3-10	Clarify wastewater collection and treatment
3-13	3-13	Add Tahoe-Truckee Sanitation Agency to list of utility providers
5-7	5-7	Add reference to figure showing existing conditions and a figure showing projected visual impacts
5-12	5-12	Correct Mitigation Measure 5.1c – change "Implementation" to "Improvement"
5-17	5-17	Add specification for LED lighting to Mitigation Measure 5.3a
5-25	5-25	Add existing conditions figure
6-7	6-7	Expand discussion of yellow-legged frog
6-14	6-14	Add reference to Mitigation Measure 6.1c
6-15	6-15	Correct typographic error
6-16 and 6-15	6-16 through 6-19	Expand discussion of yellow-legged frog and add Mitigation Measure 6.1c
6-20 and 6-21	6-23	Clarify requirements of Mitigation Measure 6.2b related to providing compensation for loss of riparian habitat.
6-23	6-26 and 6-27	Correct text identifying the determination of Mitigation Measure 6.4b
6-29	6-32	Correct text in Mitigation Measure 6.7a – change "issuance" to "approval"
12-6 and 12-27	12-6 and 12-27	Update reference to FEMA flood insurance rate map, correct typographic error
12-28	12-28	Correct text in Mitigation Measure 12.4b – change "Department" to "Division"
13-14	13-14	Correct list of applicable mitigation measures
14-4 and 14-28	14-4 and 14-28	Clarify wastewater collection and treatment
15-15	15-15	Clarify text in Mitigation Measure 15.7a
Not included	Appendix D3	Add Alpine Sierra Subdivision Sierra Nevada Yellow-legged Frog Surveys Technical Memorandum to EIR appendices
Not included	Appendix E4	Add Supplemental Memo to Traffic Impact Analysis to EIR appendices
Appendix J2	Appendix J2	Add exhibits to the Alpine Sierra Forest Management and Fuel Reduction Plan
Appendix J3	Appendix J3	Clarify and modify the Emergency Preparedness and Evacuation Plan

* Page numbering shown in Chapter 3, Text Changes to the Draft Environmental Impact Report.

CHAPTER 2
RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on November 3, 2017, including summarized comments received during the October 26, 2017 public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

Table 1-2 in Chapter 1, "Introduction," presents the list of commenters, including the binomial designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

A public hearing to receive comments on the DEIR was held on October 26, 2017. The hearing was held during the regular meeting of the Placer County Planning Commission at 10:20 a.m. A summary of public comments received at the hearing was prepared by Dudek and is provided as comment letter PC.

Several comments raised similar issues. To ensure that those issues were considered comprehensively, and to streamline this Final EIR, master responses have been developed to address the common themes and issues throughout the comments. Master Response topics, the section of this chapter where the response is located, and a summary of key issue areas addressed by the response are provided in Table 2-1 below. A reference to the master response is provided, where relevant, in responses to the individual comment.

Table 2-1
Master Response Topics

Section Number	Master Response Title	Key Topics
2.1 Master Response 1	Existing and Proposed Trail	Process for modifying trail easement, allowable use of trail
2.2 Master Response 2	Visual Resources	Changes in view from the Five Lakes Trail, changes in views from existing neighboring residences, changes in visual resources due to tree removal, construction period visual impacts, design guidelines, mitigation measure implementation
2.3 Master Response 3	Biological Resources	Special-status species, forest management and fuel reduction plan, general wildlife impacts, mitigation measure implementation
2.4 Master Response 4	Traffic Impacts	Existing traffic counts, peak hour analysis, trip generation rates, levels of services, roadway improvements, cumulative scenario, vehicle miles traveled in the Tahoe Basin
2.5 Master Response 5	Emergency Response and Evacuation	Accessibility in winter, fire hazard reduction, emergency communications, evacuation

Table 2-1
Master Response Topics

Section Number	Master Response Title	Key Topics
2.6 Master Response 6	Noise	Noise conditions in Alpine Meadows valley, construction activity noise, noise monitoring locations, alternatives, cumulative scenario
2.7 Master Response 7	Hydrology and Water Quality	Preliminary drainage report, changes in drainage due to vegetation removal, LID and BMPs, sedimentation, groundwater recharge and hydrologic changes
2.8 Master Response 8	Snow Storage	Annual snowfall, snow storage, snow storage affects to neighboring properties
2.9 Master Response 9	Fuel Management and Fire Safety	Forest management and fuel reduction plan, building materials and project design, mitigation measures, National Forest land, cumulative impacts
2.10 Master Response 10	Shelter in Place	Emergency Preparedness and Evacuation Plan,
2.11 Master Response 11	Avalanche Hazards	Exacerbation of avalanche hazards
2.12 Master Response 12	Cumulative Scenario	CEQA Requirements, Draft EIR cumulative scenario, cumulative visual resource impacts, cumulative noise impacts
2.13 Master Response 13	Alternatives	Co-equal analysis of Alternative A and Alternative B, alternatives not evaluated at a project level of detail
2.14 Master Response 14	Project Merits	Project benefits, affordable housing

The verbal and written individual comments received on the Draft EIR and the responses to those comments are provided in Section 2.15, "Responses to Comments." The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a bracket and an identifying number in the margin of the comment letter.

2.1 Master Response 1 Existing and Proposed Trail

This Master Response addresses comments on the Draft EIR analysis of impacts to an existing U.S. Forest Service trail that crosses the project site. Comments state that the EIR does not adequately describe the existing U.S. Forest Service trail that crosses the eastern portion of the project site, does not explain the legal process by which the existing easement can be modified, and does not provide sufficient information regarding the proposed trail. Comments state that this existing trail is an important and unique community feature and request the trail remain unpaved and that the current equestrian access be maintained.

The Draft EIR identifies the existing trail on pages 3-1 and 3-2 in Chapter 3, Project Description. The project site is privately-owned and the public use of the trail within the project site is authorized by the existing easement granted from the landowner to the U.S. Forest Service. The project applicant and County have consulted with U.S. Forest Service staff, who have indicated

the U.S. Forest Service willingness to consider relocation of the trail. To authorize relocation of the easement and trail, the existing easement would be abandoned and a new easement would be recorded, subject to the agreement of both the landowner and the U.S. Forest Service.

The proposed project would relocate and reconstruct the trail within the project site but would maintain it as an unpaved trail with equestrian use permitted. The relocated portions of the trail are anticipated to be constructed to a U.S. Forest Service Class 2 or Class 3 standard, as determined by the Forest Service in consultation with the applicant during review of proposed relocated easements and trail construction plans. The proposed location of the trail under Alternative A is shown on Figure 3-5 of the Draft EIR, while the proposed location of the trail under the preferred project, Alternative B, is shown on Figure 3-7. Under either alternative, the relocated trail would connect with the existing trail alignment at the project site's eastern boundary and a public use easement would be established over the relocated and reconstructed trail.

2.2 Master Response 2 Visual Resources

This Master Response addresses comments on the Draft EIR analysis pertaining to the visual impacts of the project. Comments state that the Draft EIR does not address views from houses along Bear Creek Drive, Big John Road, and John Scott Trail including the visual effects of tree removal or the visual impacts of ground disturbance and construction staging throughout a lengthy construction period. Comments also state that the project's impacts to views from the Five Lakes Trail would be greater than what is described in the EIR and shown in the visual simulation presented in Figure 5-4, both during construction and at project buildout; and that the mitigation measures provided in the Draft EIR to reduce visual impacts constitute deferred mitigation.

2.2.1 Views from Adjacent Subdivisions

Views from the neighboring Bear Creek Association subdivision, which includes Bear Creek Drive, Big John Road, and John Scott Trail, are considered less than significant after mitigation during both construction and operation. As discussed on page 5-14 of the Draft EIR, views from adjacent and nearby roads to the proposed development areas within the project site, including the proposed alignment of Road A, are somewhat limited by steep topography and dense vegetative cover. This is demonstrated by the photographs included in Figure 5-2, Project Site Views from John Scott Trail, and Figure 5-3, Project Site Views from Chalet Road. It is also demonstrated in Figure 5-5, Potential View Corridors, which illustrates Key Observation Points (KOPs) 2, 3, and 4. KOP 2 represents views to the project site from John Scott Trail, and KOPs 3 and 4 represent views from the residences at the terminus of Chalet Road to the project site. Figure 5-5 also identifies roadways and building envelopes nearest to the KOPs and shows that there is substantial forest vegetation between the proposed development areas and roadways within the adjacent subdivisions. For example, Road A is proposed to be located generally between 150 and 300 feet south of John Scott Trail, and the slope between the two roads supports white fir forest. It is not necessary to prepare visual simulations of the project from these viewpoints

because the existing topography and vegetation constrains the views of the project site from these roads, as shown in Figures 5-2, 5-3 and 5-5 of the Draft EIR.

The Draft EIR recognizes that grading and vegetation management (removal and trimming) may remove some of the natural features that would otherwise shield the proposed residences. Specifically, the Alpine Sierra Forest Management and Fuel Reduction Plan (which was included in the Draft EIR as Appendix J2 but has been updated for this Final EIR and is provided herein as Final EIR Appendix J2) prescribes vegetation removal and thinning treatments that would be implemented throughout the project site. All vegetation within 5 feet of any structure (the Fire Free Zone) would be removed, while vegetation thinning would be required at further distances from the structures. Under both alternatives, the Structural Protection Zone extends 30 feet beyond each building and would cover 24 acres of the site. In this zone, vegetation thinning would be required to limit the vertical and horizontal connectivity of trees. As discussed further in Section 2.2.2, the Draft EIR determines that tree removal and thinning would reduce the degree to which neighboring residents views of the homes and other improvements that would be constructed on site are screened. Under either alternative, all structures and infrastructure onsite must comply with the design, building materials, and building color requirements of the Architecture Handbook (Draft EIR Appendix B3), while under Alternative B, all construction onsite must also meet the additional design requirements detailed in the Development Standards, which are somewhat more restrictive than the development standards proposed for Alternative A, the originally proposed project. The Draft EIR concludes that with implementation of the Architecture Handbook and the screening provided by the existing topography and vegetation, some existing neighbors would have filtered views of retaining walls associated with Road A and residences, but the project would not substantially alter the visual character of the project site because the site's existing topography and vegetation communities would be largely retained. Under Alternative B, which is the applicant's preferred project, compliance with the Development Standards would further reduce the potential visual impacts associated with construction of the proposed dwelling units.

2.2.2 Tree Removal Visual Impacts

The proposed project would require removal of trees for construction of roadways, infrastructure, and structures, and for the creation of defensible space around each structure as described in the proposed Forest Management and Fuel Reduction Plan. This plan was provided in Appendix J2 of the Draft EIR. The plan has been modified to incorporate exhibits documenting the fire severity zone designations in the Alpine Meadows valley, summarizing requirements to ensure 100 feet of defensible space are provided around each structure, and graphically depicting how the four different fuel modification zones described in the plan would be distributed throughout the project site as shown in Exhibit C of this plan. The updated Forest Management and Fuel Reduction Plan is provided as Appendix J2 to this Final EIR.

Tree Removal Impacts to Views from Neighboring Subdivisions

As discussed previously, views of the project site from the adjacent subdivision (Bear Creek Association) are constrained in part due to existing vegetation. The proposed lots that are nearest to roads within the Bear Creek Association subdivision are lots 21 through 25 (under both Alternative A and Alternative B). The northwestern corner of Lot 25 is approximately 140 feet from John Scott Trail and there is generally a minimum of 200 feet of separation between the northern edge of lots 21 through 24 and John Scott Trail. Additionally, proposed Road A would pass generally between 150 and 300 feet from John Scott Trail. The northern boundary of lots 21 through 25 are coterminous with the northern boundary of the project site. None of the vegetation removal and thinning requirements apply to properties outside of the project site, thus the vegetation on the slope between John Scott Trail and lots 21 through 25 would not be subject to any treatment, and there would be no loss of vegetation and topographic screening. There is a portion of the project site north of proposed Road A that would be subject to the vegetation management requirements of the Wildland Fuel Reduction zone, as shown in Exhibit C of the Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2). This zone requires thinning of vegetation but would not create wide gaps in vegetation that could substantially increase views of the project site from neighboring properties. Specifically, this zone requires leaving "small areas of dense vegetation while creating and or maintaining openings where increased sunlight can reach the ground. Focus thinning on small diameter (generally 10 inch DBH or less) suppressed and/or dead trees, shrubs, and limbs while maintaining wildlife structures. However, retain a wide variety of age, size, and decay classes, including dead and dying vegetation consistent with fuels reduction goals" (Final EIR Appendix J2).

In addition Mitigation Measure 5.1c requires that all grade cuts be revegetated or stabilized with retaining walls constructed from natural or natural-appearing materials. Revegetation would provide ensure exposed earthwork between the Bear Creek Association and the proposed project would be re-established with seasonal grasses and forbes, while retaining walls would be constructed with natural materials to be compatible with the natural visual conditions of the project site and surrounding areas.

Tree Removal Impacts to Views from Five Lakes Trail

As discussed on pages 5-2 and 5-3, in Chapter 5, Visual Resources, of the Draft EIR, the project site is visible from many locations along the Five Lakes Trail, particularly for south-facing trail users along the lower and middle portions of the trail. On page 5-3, the Draft EIR states that although current views from the Five Lakes Trail include views of the Alpine Meadows Ski Resort and existing residential development, "the natural vegetation comprises the dominant visual component of the landscape in a well-used recreational area with a number of established residential communities." Figure 5-4A has been added to the Draft EIR, as shown in Chapter 3 of this Final EIR to document existing views of the project site from the Five Lakes Trail and the visual simulation has been renumbered to Figure 5-4B.

Impacts to views from the Five Lakes Trail are evaluated in the Draft EIR under Impact 5-1, on pages 5-6 through 5-13. During construction, equipment and materials stockpiles located within the project site could be visible from the trail. The Draft EIR concludes that implementation of Mitigation Measure 5.1a, which requires that construction material staging areas be identified on project plans and placed where they would be visually screened from the Five Lakes Trail and Alpine Meadows Road, to the extent feasible, would "ensure that temporary effects to scenic viewsheds during construction remain less than significant."

In addition, the vegetation removal necessary to accommodate construction and to meet the requirements of the Forest Management and Fuel Reduction Plan would alter the views from the Five Lakes Trail by reducing the canopy cover throughout the project site. This tree removal and vegetation thinning is reflected in the visual simulation as discussed in the following section. However, due to the distance and angle of view, the vegetation removal would not substantially alter the visual character of the Alpine Meadows valley from this viewpoint. As shown in the visual simulation (Figure 5-4B as shown in Chapter 3 of this Final EIR), the natural vegetation community would continue to comprise the dominant visual component of the landscape. In addition, Mitigation Measures 5.1c, 5.1d, and 5.1e would ensure that development within the project site incorporates appropriate building and infrastructure materials and colors that would ensure the developed features within the project site blend into the existing visual setting. This would ensure that impacts to views from the Five Lakes Trail are reduced to a less than significant level. In summary, while tree removal required under the Forest Management and Fuel Reduction Plan would reduce the total amount of vegetation within the project site, implementation of this plan would not substantially alter the visual character of the project site as viewed from the Five Lakes Trail.

The biological effects related to tree removal are evaluated in Impacts 6-1 and 6-2 and are discussed further in Master Response 3. The Draft EIR concludes that these impacts would be less than significant.

2.2.3 Visual Simulation of Views from the Five Lakes Trail

Comments state that the visual simulation of views from the Five Lakes Trail does not accurately represent the changes in viewshed that would result from project implementation. As noted on page 5-8 of the Draft EIR, there are no distinctive scenic resources within the project site visible from the Five Lakes Trail. Rather, the site is a part of the larger intact conifer forest that defines the local landscape. Please note that exhibit 5-4A was added to the Draft EIR to represent existing views of the project site from the Five Lakes Trail. The visual simulation has been renumbered as Figure 5-4B. Figures 5-4A and 5-4B are provided in Chapter 3 of this Final EIR.

The visual simulation was created from digital photographs taken from the Five Lakes Trail which was then manipulated using 3D Studio Max, Vray, AutoCAD Civil 3D, and Photoshop. These programs are the industry standard in creating visual simulations. All programs used were true to

scale and relied on real camera values. Models for the proposed houses were provided by the applicant. A 3D model was developed to replicate and match the existing topography in the photo. AutoCAD Civil 3D was used to create a terrain model reflecting the proposed final grades throughout the project site. The terrain model includes 3D contours for the proposed roads, pads, cut slopes, fill slopes and retaining walls. The terrain model was then imported into 3D Studio Max and materials and textures were applied. All cut and fill slopes received a groundcover texture. The roads were applied with a typical asphalt texture and the retaining walls received a stacked block texture. The 3D house models provided by the applicant were then inserted onto the finish grade surface at their exact finish floor elevations. The 3D images are rendered to high resolution tiff images. These images are then brought into Photoshop for final editing. This included adding foreground hills and vegetation that would appear in front of the 3D rendering; for instance, any trees that will remain that are in front of the 3D model.

Commenters were concerned that the colors used in the visual simulation do not accurately reflect the materials and colors that would be used within the project. The modeling relied upon industry standard asphalt texture and color. Additionally, Road A is located on a north-facing slope and thus will be in tree shadow the majority of the time. The building finishes would be in accordance with the Architecture Handbook and thus would mimic the existing natural color scheme. Colors used in the simulation reflect the requirements of the Architecture Handbook and the colors of existing homes within the viewshed.

Commenters were also concerned that the simulation did not accurately show the reflection from windows, cars and other reflective/shiny objects. The Architecture Handbook requires that large windows be set back under roof overhangs or other recesses in shadow to avoid creating glare. The Architecture Handbook also requires that buildings be finished with natural or earth tone materials and colors and that Road A guardrails, where constructed, be a rusted metal finish or painted to mimic rusted metal. Under the design requirements of the Architecture Handbook, the proposed project proposes the uses of limited reflective materials. Further, the project site is on a north-facing slope; this would further reduce the potential for the project to create glare. The amount of glare would be similar or less than the amount from existing homes and buildings in the viewshed of the visual simulation, and the project would not create a substantial source of glare.

2.2.4 Construction Period Visual Impacts

Comments on the Draft EIR state that the EIR does not consider the visual impacts associated with 15 to 20 years construction. Construction is anticipated to occur in as many as four phases for Alternative A and up to three phases for Alternative B, which is the preferred project. The project would undertake construction of roads and other infrastructure and the HOA facilities. Individual home construction would be undertaken by the individual lot owners. Comments are correct that the ultimate buildout of the project would be dependent on market conditions. This is reflected in the project objectives listed in Chapter 3, Project Description, which include an objective to “create a phasing plan that has sufficient flexibility to be responsive to future market conditions.”

The full length of construction depends on the independent decisions by individual lot owners. As discussed above, existing topography and vegetation constrains the views of the project site from adjacent subdivisions, as shown in Figures 5-2, 5-3 and 5-5. Thus, construction activities within most of the lots would not be visible from offsite locations. As construction within individual lots occurs over time, some existing neighbors may have temporary views of construction equipment, materials, and activities; but no individual neighbors would have views of all construction activities occurring throughout buildout. Additionally, the Improvement Plans for the construction of the backbone infrastructure as well as for development within each individual lot are required to identify materials and equipment staging and stockpiling areas. This would allow the County and Architectural Review Committee to review those locations and ensure they are located appropriately to minimize adverse visual impacts to existing neighbors. Section 7 of the Architecture Handbook includes several performance standards and construction management requirements that would further limit the temporary adverse visual effects of construction. This includes Section 7.5, which states that the use of construction trailers on site is highly discouraged, and Section 7.7, which requires that builders maintain their construction sites in a neat and orderly fashion and shall clean up and remove all debris on a daily basis.

The Draft EIR correctly concludes that adverse visual impacts during construction would be temporary and would be reduced to a less than significant level with implementation of Mitigation Measure 5.2a, which requires compliance with the performance standards related to locations of construction material staging areas, content and approval requirements for Improvement Plans, treatment of grade cuts, and material selections for guard rails and other roadway safety features identified in Mitigation Measures 5.1a through 5.1e.

2.2.5 Design Guidelines

As described on pages 3-8 and 3-9 of the Draft EIR, the proposed project includes a project-specific Architecture Handbook: Design Guidelines & Improvement Requirements, which was included in Appendix B of the Draft EIR. The Architecture Handbook provides information on all aspects of site design, grading, building design, and construction. It also defines project-specific development standards including maximum building coverage limits based on the lot size, maximum building height, setbacks, and stream protection easements. Building materials and colors are encouraged to blend into rather than compete with the natural surroundings. Specifically, the Architecture Handbook stipulates that structures should be made of wood, steel or stone and that weathered materials and textured cementitious materials are permitted if appropriate coloring is used. The Architecture Handbook would be used to ensure that aspects of the built landscape maintain compatibility with each other and promote high-quality architectural design. As stated in Section 5-4 of the Architecture Handbook, building height would be limited to a maximum of 35 feet above the natural grade of the site, but upon approval of the Architectural Review Committee some taller elements may extend up to 45 feet. The supplemental Development

Standards developed for Alternative B, the applicant's preferred project, further constrain building mass and height and no buildings would be taller than 35 feet.

The degree to which individual lot design meets the recommendations of the Architecture Handbook would be considered by the project's Architectural Review Committee. As individual lot owners develop proposed building plans, the Committee would review those plans and direct owners to modify plans as necessary to ensure conformance with the Architecture Handbook. This would include monitoring throughout the construction phase to ensure that all exterior colors and lighting remain within the requirements of the Architecture Handbook. The Architecture Handbook states that no construction preparation or activities can occur, including clearing, grading, landscaping, and construction, without prior approval of the Committee. The Architecture Handbook (Draft EIR Appendix B3) would be implemented under either Alternative A or Alternative B, while additional lot design requirements would apply to Alternative B under the Supplemental Development Standards provided in Appendix B4 of the Draft EIR.

Section 5-14 of the Architecture Handbook requires that exterior lighting generally be downward directed and must be "Dark Sky" compliant. These standards direct that outdoor lighting should be used for safety and for way finding and shall be directed downward towards the ground; additionally, façade lighting is prohibited. They also require that light fixture enclosures must be constructed to conceal or substantially diffuse the light source and that landscape lighting must be limited to small quantities with limited area and intensity and must be connected to a human element. Lighting would be reviewed as part of the building plans subject to approval by the Architectural Review Committee. Comments raised concerns that, while these conditions would restrict light pollution, lighting may still negatively impact neighboring developments downslope of the proposed project. However, as discussed previously and shown in Figures 5-2, 5-3 and 5-5 in the Draft EIR, neighboring subdivisions would have limited filtered views of the proposed project due to topography and vegetation screening, which would restrict the ability of the project's lighting to affect neighboring developments.

2.2.6 Mitigation Measures

The proposed project requires the implementation of mitigation measures, including the submittal of Improvement Plans. Comments stated that reliance on the Improvement Plans constitutes deferred mitigation, which would violate CEQA. Reliance on the future Improvement Plans to ensure the project's design requirements are met does not constitute deferred mitigation because the EIR and the County's development standards include specific performance standards that must be met to ensure visual impacts remain less than significant. The performance standards are established in the County's existing development standards, the proposed Architecture Handbook (applicable to both Alternative A and Alternative B), and the proposed Supplemental Development Standards (applicable to Alternative B only). These include minimum standards related to grading, drainage, and other site improvements. When Improvement Plans are submitted by the project applicant, they would be reviewed by the Placer County Community Development Resource

Agency, including the Engineering and Surveying Division and the Planning Division, to ensure conformance with the project's conditions of approval, the mitigation measures included in the certified EIR and Mitigation Monitoring and Reporting Program, the proposed Architecture Handbook (Alternatives A and B), the proposed Supplemental Development Standards (Alternative B only), Placer County Land Development Manual, Placer County General Specifications, Placer County Design Plates, Placer County Stormwater Management Manual, State and Federal construction standards/requirements, and general engineering practices. As review and approval of these plans ensures compliance with existing codes and defined guidelines, the requirement for approval of Improvement Plans does not constitute deferred mitigation. This approach is consistent with CEQA case law, specifically the finding in Gentry v. City of Murrieta (1995) 36 Cal.App.4th at 1394, quoting Sacramento Old City Assn. v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029 that "it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them."

2.3 Master Response 3 Biological Resources

Comments state that the Draft EIR does not appropriately address impacts to special-status species including the Sierra Nevada yellow-legged frog (SNYLF), yellow warbler, Sierra marten, Sierra Nevada snowshoe hare, long-legged myotis bat, and fish. Comments also state that the Draft EIR does not adequately evaluate impacts to biological resources associated with tree removal and loss of forest vegetation. Comments assert that the mitigation measures will not provide appropriate protection for special status species and may be overly precise with respect to timing for nesting and roosting surveys.

2.3.1 Sierra Nevada Yellow-Legged Frog

The Draft EIR identifies that the project site is within the critical range for the SNYLF, which is listed as a threatened species under the federal Endangered Species Act. Chapter 6, Biological Resources, has been modified to reflect the comment provided by the U.S. Fish and Wildlife Service regarding this species. The revised text identifies that there is suitable non-breeding habitat for this species onsite, and identifies a detailed mitigation measure that requires an initial visual encounter survey for adult/metamorph SNYLF within all suitable aquatic habitats within the project site be completed prior to commencement of any construction activities onsite. The measure also requires that the survey be repeated in each subsequent year during which construction would occur in areas where potential non-breeding habitat occurs. If any SYNLF are detected in the current year survey, the measure requires that daily biological monitoring be conducted in the potential non-breeding habitat and that construction equipment be prohibited from entering areas within 100 feet of the habitat on any day when SNYLF are observed further than five feet from surface water.

2.3.2 Yellow Warbler and Other Nesting Birds

Comments raised concern that Mitigation Measure 6.1a, which requires pre-construction surveys for yellow warbler and protection of any active nests, and Mitigation Measure 6.5a, which requires pre-construction surveys for other nesting birds, could preclude construction throughout most of each summer, which would lead to a protracted construction schedule and buildout lasting 15 to 20 years or more. The yellow warbler is identified as a species of concern by the California Department of Fish and Wildlife while all nests are protected under the Migratory Bird Treaty Act.

As stated on page 6-15 of the Draft EIR, one yellow warbler was observed in a large alder thicket near the center of the project site. This location supports the largest patch of montane riparian habitat on the site. The EIR also states that is reasonable to conclude that all other riparian thickets within the site that have sufficient width to provide visual cover would provide suitable foraging and nesting habitat for this bird.

Mitigation Measure 6.1a applies only to construction activities within 100 feet of suitable nesting habitat for the yellow warbler, which is restricted to montane riparian thickets. This vegetation cover type is generally limited to areas proximate to the drainage features within the site, as shown on Figure 6-1. Should adult yellow warblers be identified during the pre-construction surveys, no construction would be permitted within 100 feet of their observed location "until it is conclusively determined that no nest is present, or the nest is identified and young have fledged." The yellow warbler's nesting cycle includes approximately 4 days to construct the nest, 10 to 13 days for incubation of the eggs, and 9 to 12 days until young have fledged. Thus, a nesting cycle could require up to 30 days of restriction on construction activities within 100 feet of suitable nesting habitat. This is a typical requirement for development projects throughout California and would not substantially delay construction or lengthen the construction schedule.

The 100 foot setback requirement included in Mitigation Measure 6.1a is based on the sensitivity of yellow-warbler to human activity. This species nests in thick vegetation of sufficient width to provide visual cover for the nest site. The habitat requirements combined with the 100-foot setback would be sufficient to ensure that yellow warblers do not abandon their nests.

Similarly, Mitigation Measure 6.5a requires pre-construction surveys for nesting birds prior to grading or tree removal. When an active nest is identified, construction activities would be prohibited within 500 feet of that location until the nest is no longer active (the young birds have fledged). This is a typical requirement for development projects throughout California and would not substantially delay construction or lengthen the construction schedule. It is usually possible to modify the construction schedule to allow construction activities that are outside the required nest-protection buffer to proceed while waiting for the young birds to fledge.

Compliance with both of these mitigation measures would be monitored and enforced by County staff through the development review process. Prior to issuance of Improvement Plans, pre-construction survey reports would need to be submitted to County staff, improvement plans would be required to show any required setback areas, and protective fencing would be required to be installed at the boundary of those setback areas.

Tree removal that occurs outside of the nesting season would not constitute a significant impact because only active nests are protected under the Migratory Bird Treaty Act. While development of the proposed project would remove some potential nesting habitat and increase human activity within the site, which could reduce the attractiveness of the site for nesting by some bird species, the Draft EIR concludes that sufficient areas of vegetation would remain in the project vicinity to support typical bird populations.

2.3.3 Sierra Marten, Sierra Nevada Snowshoe Hare, Long-Legged Myotis Bat

Comments state that the Draft EIR conclusion that special-status wildlife will not be impacted because of the proximity of existing development to the site is in error because there is no development within 1,000 feet of the eastern boundary of the project site. The Draft EIR does not state that these species do not occur onsite. Rather it demonstrates that the site is not likely to support denning by the Sierra marten or Sierra Nevada snowshoe hare and has limited foraging value for the long-legged myotis bat. Specifically, on pages 6-20 and 6-21, the Draft EIR states:

> "Although Sierra marten may use the site periodically for forage, it is unlikely that it would den within the site, because of the site's proximity to existing development;"
>
> "The site also has suitable roost sites for long-legged myotis, namely trees with thick bark and/or cavities; however, foraging value for the species is moderate, at best;" and
>
> "Sierra Nevada snowshoe hare would be expected to occasionally forage on the site within the white fir forest habitat, and could potentially nest within riparian thickets nearby. Sierra Nevada snowshoe hare is a CDFW species of special concern; however, due to the proximity of existing development, the species is not expected to use the site beyond occasional use for foraging, and the proposed development would not constitute a significant reduction in suitable habitat."

The presence of existing development and human activity in the vicinity of the project site is an important consideration because of the irregular shape of the project site. While comments are correct that the U.S. Forest Service property adjacent to the east of the site is undeveloped, the majority of the project site is surrounded by development, as shown in Figure 3-3 in Chapter 3, Project Description. The conclusions in the Draft EIR are based on the Biological Survey Report prepared for the project (provided in Draft EIR Appendix D), which was prepared by a qualified

biologist with expertise in the alpine environment and the species that occur there. Preparation of this report included reviewing aerial photography of the project site and surrounding areas, background literature review, and conducting a detailed site visit. Thus the existence of open space within the Tahoe National Forest land east of the project site was considered in identifying and evaluating the biological resources within the project site. The comments on the Draft EIR have not provided any evidence that the presence of open space east of the project site invalidates any of the conclusions of the Biological Survey Report.

2.3.4 Forest Management and Fuel Reduction Plan

Biological Impacts Associated with Tree Removal

Biological resource impacts associated with implementation of the Vegetation Management Plan are evaluated in Draft EIR Chapter 6 and found to be less than significant due to the prevalence of the white fir forest habitat type in the region and the lack of suitable denning habitat for special-status species within the project site.

Tree Preservation Ordinance

Comments questioned whether implementation of the proposed Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided as Final EIR Appendix J2) would be in conformance with the County's Tree Preservation Ordinance. Placer County Code Section 12.16.010 establishes the intent of the Tree Preservation Ordinance as "reduc[ing] the loss of trees to reasonably acceptable levels, while at the same time providing for fuel reduction and fire prevention activities." Further, Section 12.16.050B states "Tree removal necessary to comply with [California Department of Forestry and Fire Protection (CDF)] fire safety regulations (i.e., clearing around homes) or tree removal undertaken as a part of a fuel reduction/fire safety/fire protection program in conformance with commonly accepted CDF policies" is exempt from the requirements of the Tree Preservation Ordinance. This exemption would apply to implementation of the proposed Forest Management and Fuel Reduction Plan. As summarized above, the biological resource effects associated with changes in vegetation communities that would result from implementation of the Forest Management and Fuel Reduction Plan are evaluated in the Draft EIR. Thus, while implementation of the Forest Management and Fuel Reduction Plan is exempt from the requirements of the Tree Preservation Ordinance, the environmental effects of implementing that plan are not exempt from CEQA and have been evaluated and mitigated to the extent feasible.

2.3.5 General Wildlife Impacts

Comments raised concern that the project could contribute additional run-off to Bear Creek that could lead to sedimentation and reduced water quality in Bear Creek and in the Truckee River, which could then have adverse impacts to fish in those waterways. As discussed in Master Response 7, Hydrology and Water Quality, the project would be required to implement Low Impact Design requirements and Best Management Practices throughout all construction activities

within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

Comments noted that the project site supports a variety of standard wildlife (those species that do not have any special legal status) and that the project would remove habitat for those species and lead to increased human/wildlife interactions, including interactions with bears. On page 6-20, the Draft EIR states "The project site supports a diversity of wildlife species. Four species of mammals and 11 species of birds were observed on site during surveys, and a number of special-status mammal, bird, and amphibian species were identified as having potential to occur within the on-site habitats according to the CNDDB search. The project site also supports a wide variety of plant species. More than 140 plant species were identified on site, as listed in Appendix A of the Biological Survey Report provided in Appendix D to this [Draft] EIR." However, under CEQA, loss of habitat for wildlife that do not have special status is considered a less than significant impact because the loss of this habitat is not expected to adversely affect the survival of common wildlife and plant populations. The Draft EIR considers the effects of loss of habitat in Impact 6-2.

2.3.6 Mitigation Measures

Comments questioned various aspects about the biological resource mitigation measures.

Bat surveys required under Mitigation Measure 6.1b would be implemented in a similar process as Mitigation Measure 6.1a and 6.5a, discussed above. The results of the survey would need to be submitted and any required protection measures would need to be shown on Improvement Plans prior to County approval of the Improvement Plans.

Mitigation Measure 6.2a requires that details of the proposed bridge construction are included in the Improvement Plans and must demonstrate that bridge designs avoid permanent or temporary impacts to perennial or seasonal streams. The construction details and any required protection measures would need to be shown on Improvement Plans. Similarly, Mitigation Measure 6.2b requires submittal of a riparian habitat protection plan and restoration program prior to approval of Improvement Plans and Mitigation Measure 6.2c requires that the project applicant obtain and implement a Streambed Alteration Agreement from the California Department of Fish and Wildlife. The riparian habitat protection plan is required to include provisions by which the project applicant would restore or replace any riparian habitat, as described on Draft EIR page 6-19, that is removed or damaged at a 1:1 ratio, either through onsite restoration or participating in an approved compensatory program. This measure applies only to construction of bridges, which is the only portion of the proposed project that has a potential to result in direct impacts to riparian habitat. Implementation of Mitigation Measures 6.2a, 6.2b, and 6.2c would ensure that impacts to riparian habitat remain less than significant. The County would verify compliance with the requirements of each of these measures prior to approval of Improvement Plans.

Mitigation Measure 6.4a requires the project applicant to obtain permits under the Clean Water Act to authorize any unavoidable impacts to waters of the U.S. As noted in Chapter 6, Biological Resources, the project is expected to result in impacts to all of the 0.11 acres of ephemeral drainage within the project site. Mitigation Measure 6.4a requires that the Clean Water Act permits be obtained prior to the County's approval of Improvement Plans. This would ensure that all permits necessary under the Clean Water Act are obtained prior to County issuance of Improvement Plans that involve any impact to wetlands and waters of the U.S.

2.4 Master Response 4 Traffic Impacts

Comments on the Draft EIR raised several concerns related to the analysis of traffic impacts. These include the age and appropriateness of the existing traffic counts, assumptions regarding trip generation and the number of recreation homes, the validity of conclusions regarding changes in traffic levels, cumulative impacts, vehicle miles traveled, non-auto transportation, and construction impacts. The analysis in the Draft EIR was based on Traffic Impact Analysis prepared for Alternative A (LSC Transportation Consultants 2015), and the supplemental memo evaluating Alternative B (LSC Transportation Consultants 2014), which were provided in Draft EIR as Appendix E1 and Appendix E2. This Master Response includes references to and explanation of the analysis in the Traffic Impact Analysis and supplemental memo, as well as additional information provided in the LSC Transportation Consultants memo Alpine Sierra Subdivision EIR – Supplemental Traffic Analysis, February 12, 2018. This memo has been added to the EIR appendices as Final EIR Appendix E4.

Comments regarding emergency access and evacuation are addressed in Master Response 5.

2.4.1 Existing Traffic Counts

As demonstrated in the following discussion, the Traffic Impacts Analysis appropriately relies upon the traffic volume data collected in March 2012 and Caltrans data to develop a reasonable estimate of traffic volumes that would occur during the 30th-highest winter PM peak hour in 2014 (which is the year that the Notice of Preparation for this EIR was circulated), and then calculates the project's impacts during those conditions. Additionally, traffic volumes in 2016/2017 were generally equivalent to the estimated 2014 volumes. Therefore the Traffic Impact Analysis and Draft EIR reasonably reflect the effects of the proposed project under current conditions.

<u>Age of Data</u>

The existing traffic count data was collected in August 2011 and March 2012. Comments on the Draft EIR state this is not reflective of current conditions due to the age of the data and low snowfall in the 2011/2012 winter. CEQA allows that the impact analysis in an EIR be based on the conditions that existed at the time that the Notice of Preparation for the EIR was circulated. The Notice of Preparation for this EIR was circulated in April 2014. As stated on page 7-3 of the

Draft EIR, a growth factor was applied to the 2011 and 2012 traffic count data to estimate year 2014 traffic volumes. The growth factor was determined based on a review of Caltrans historical traffic volume data for State Route 89, which shows that peak-month daily traffic volumes over the last 5 years increased approximately 2% per year.

Because the traffic count data was adjusted to reflect year 2014 conditions, the EIR was completed in compliance with CEQA requirements. However, to provide the public and Placer County decision-makers with an understanding of how the results of the Traffic Impact Analysis may relate to current conditions, LSC reviewed Caltrans traffic volume data collected at the Rampart count station on State Route 89 (located between Alpine Meadows and Tahoe City) and compared it to the peak-hour traffic volumes identified in the Traffic Impact Analysis and Draft EIR. As documented in the 2018 Supplemental Memo (Final EIR Appendix E4), LSC reviewed the most recent available data – covering the 2015/2016 winter season – and focused on three holiday weekend Saturdays: the Saturday before the Martin Luther King Jr.'s birthday holiday, the Saturday before the Presidents' Day holiday, and the Saturday after Presidents Day, which is at the end of Ski/Skate Week. LSC found that the highest AM peak hour traffic volume on these Saturdays was 1,460 vehicles while the highest PM peak hour traffic volume was 1,590 vehicles. LSC then estimated the 30th-highest winter peak hour volumes to be 1,125 vehicles in the AM peak hour and 1,270 vehicles in the PM peak hour. In comparison, the Year 2014 AM and PM peak-hour traffic volumes identified in the EIR at a point on State Route 89 immediately south of Alpine Meadows Road are 1,442 and 1,341 vehicles. Because these identified 2014 peak hour volumes are greater than the 2016/2017 peak hour volumes, the traffic volumes in the traffic study are considered to be reasonably conservative and the conclusions of the Traffic Impact Analysis reflect the effects of the proposed project on current conditions in the project area.

Peak Traffic Volumes

Comments also stated that data collected during a weekend in March is not reflective of the peak traffic volumes on holidays. The County's standard approach to evaluating traffic impacts is to evaluate the 30th percentile highest traffic peak hour volume, rather than the highest peak. This is a typical approach regionally and statewide because it allows for transportation infrastructure to be designed to a level of traffic that is routinely experienced rather than oversizing infrastructure to accommodate the highest level of activity that occurs on a relatively few number of days per year. For example, retail area parking lots are typically sized to meet the demand on a typical busy day but not to meet peak holiday season parking demands. This approach is consistent with the recommendations in the American Association of State Highway and Transportation Officials A Policy on Geometric Design of Highways and Streets, which states that "the hourly volume that should generally be used in design is the 30th highest hourly volume of the year" for rural arterials (Final EIR Appendix E4).

As stated on page 7-3 of the Draft EIR, the traffic count data collected in March was adjusted to reflect the 30th-highest winter PM peak hour, as determined based on a review of Caltrans hourly

traffic data for the entire winter of 2011/2012 and the volume of traffic turning to/from Alpine Meadows Road was estimated based on the 14th-highest skier day at the Alpine Meadows Ski Area as determined by a review of actual skier counts for the 2011/2012 ski season. Thus, by evaluating the 30th-highest peak hour of traffic, the Traffic Impact Analysis meets the County's requirements and standards and is consistent with industry standard approaches to evaluating potential traffic impacts.

2.4.2 Peak Hour

Comments also request clarification of the determination of the peak hour of traffic. As stated in the 2018 LSC supplemental memo (Final EIR Appendix E4), traffic count data was collected between 9 AM and 12 PM and between 3 PM and 5 PM. The data was then reviewed to determine the 60-minute period in the AM and PM data collection timeframe where traffic volumes were the highest. For the AM data, this was the period between 10:45 and 11:45. Comments on the Draft EIR indicate that traffic volumes during the 9 AM hour are higher than the volumes during the identified AM peak hour. While this may generally be true, on the day that traffic volume data was collected, the total number of vehicles passing by the count location was highest between 10:45 and 11:45. The Traffic Impact Analysis does not assume or assert that this will always be the peak hour of traffic at the count location. Instead, the impact analysis relies on the total volume of traffic during the observed peak hour to define the background levels of peak hour traffic existing in the project area, and adds the traffic generated by the proposed project to those levels to determine whether a significant increase in congestion or delay would occur.

2.4.3 Trip Generation Rates

<u>Vacation Homes</u>

The Draft EIR assumes that 75% of the detached dwelling units constructed onsite would be vacation homes, which are homes that are used by the owner periodically or rented on a seasonal basis. These homes tend to have lower trip generation rates than primary residences because the occupants typically do not make the same types of trips related to work, school, family activities such as sports team practices and games, and other various errands of daily life while staying in recreational area. While 75% of the detached units are evaluated as vacation homes, the Traffic Impact Analysis assumes 100% occupancy of all units within the project site. All of the attached dwelling units (i.e. half-plex units) proposed in Alternative A are assumed to be year-round residences. There are no attached dwelling units proposed in Alternative B.

As described in the Traffic Impact Analysis the assumption that 75% of the detached units would be used as vacation homes was reached based on a review of the 2006-2010 American Community Survey data from the US Census. This data indicates that approximately 75.8% of dwelling units in the census tract containing the Alpine Meadows area are used as recreation homes (Draft EIR Appendix E1). In preparation of this Final EIR, LSC reviewed the 2011-2015 American Community Survey data, which shows that the portion of recreation homes in the project site

census tract has increased to approximately 77.9% (Final EIR Appendix E4). Thus the Traffic Impact Analysis assumption that 75% of the detached units would be vacation homes is appropriate and reasonably reflects existing and anticipated land use trends in the area.

The trip generation rates for the vacation homes applied to the proposed project are the standard Institute of Transportation Engineers (ITE) trip generation rates. The ITE rates are determined based on trip volume data collected at existing development sites which is then correlated to the number of dwelling units (or non-residential square footage) at the site. Trip rates are not correlated to the number of bedrooms and it is not standard traffic engineering practice to estimate trip generation based upon the number of bedrooms. Since the trip generation rates are determined based on empirical data collected at existing developments that contain the same land use being evaluated, the data for vacation homes reflects the typical usage patterns of this type of land use, including the potential for a vacation home to be occupied by more people than would be typically expected to reside in a year-round residence.

Non-Automobile Travel

The project objectives listed in Chapter 3, Project Description, include a statement regarding constructing homes within walking distance of the Alpine Meadows ski area. Comments on the Draft EIR state that this objective is not realistic because the proposed homes would be located too far from the ski area for walking to be feasible. The homes within the western development pod would be located less than one-half mile from the base of the Subway lift at the Alpine Meadows Ski Area. Residents and visitors in these lots, which include 20 attached dwelling units under Alternative A and 10 detached dwelling units under Alternative B, could walk to the lift and/or ski back to within a short distance of their unit. This distance is generally considered a walkable distance in land use and transportation planning. Additionally, as noted in Draft EIR section 7.1.3 shuttle service provided by the Alpine Meadows Ski Area and Squaw Valley resort could also be used by residents of and visitors to the project site. However, as stated on page 7 of the Traffic Impact Analysis (Draft EIR Appendix E1), no reduction in trip generation was applied to ensure the impact analysis is based on conservative assumptions.

Draft EIR section 7.1.4 notes that there are no designated bicycle or pedestrian facilities along Alpine Meadows Road. Comments on the Draft EIR questioned whether any bicycle or pedestrian facilities improvements would be necessary as a result of the project. As discussed in Draft EIR Impact 7-1 and shown in Table 7-1, Under Alternative A, the project is expected to generate a maximum of 27 peak hour trips and 277 total daily trips on Alpine Meadows Road, while under Alternative B the project would generate a maximum of 23 peak hour trips and 224 total daily trips. As shown in Draft EIR Figure 7-1, Alpine Meadows Road currently carries approximately 640 vehicles during the winter AM peak hour, 630 vehicles during the winter PM peak hour, and 190 vehicles during the summer PM peak hour. The additional trips that the project would generate during peak hours would not substantially increase roadway congestion or vehicle volumes on Alpine Meadows Road and thus would not represent an increased hazards to pedestrians and

bicyclists. Additionally, a project typically generates much less pedestrian and bicycle activity than vehicle trips. Thus the project is not expected to generate sufficient volumes of pedestrian and bicycle traffic that would require additional pedestrian and bicycle facilities to ensure safety.

2.4.4 Levels of Service

Comments on the Draft EIR questioned how the determination that the intersection of Alpine Meadows Road and State Route 89 operates at levels of service (LOS) A and B comports with local residents' experiencing drive times to the Town of Truckee as long as two hours and drive times to Tahoe City as long as 90 minutes.

The LOS at the intersection of Alpine Meadows Road and State Route 89 was determined based on the collected traffic volumes, the intersection design and geometry, the traffic signal phasing and timing, and use of the regional traffic model to determine how the project-generated traffic would affect intersection operations. As shown in Draft EIR Table 7-4, in the existing plus project condition, the maximum delay at the intersection would be 12.6 seconds. The LOS definitions established by the Transportation Research Board provide that a delay of 10.0 seconds or less correlates to LOS A while a delay of between 10.1 and 20.0 seconds correlates to LOS B (Transportation Research Board 2010). Table 7-4 shows that the intersection would operate at LOS A and B during each of the modeling scenarios (winter AM peak hour, winter PM peak hour, and summer PM peak hour). The determination of the existing plus project LOS for the intersection of Alpine Meadows Road and State Route 89 was developed using industry standard methodology, data, and tools. There are many reasons why individuals may experience longer than expected drive times. As discussed above, the modeling and analysis is based on the 30th-highest peak hour traffic volumes in the project area, rather than the highest volumes that occur on busy holiday weekends. Congestion is increased throughout the region on busy holiday weekends, which would increase the time needed to reach a certain destination. Road work, traffic collisions, inclement weather, and the presence of slow-moving trucks or tourists are also common reasons for travel time delays. Comments have not provided any data or analysis demonstrating that LOS C or worse conditions exist when the 30th-highest peak hour traffic volumes occur.

2.4.5 Roadway Improvements

Comments on the Draft EIR suggest that a traffic signal and/or turn lane should be installed at the project site access onto Alpine Meadows Road. As discussed above, the proposed project would add a maximum of 27 peak hour trips and 277 daily trips to the existing traffic volumes on Alpine Meadows Road. Traffic signals are typically only placed at intersections where the minimum traffic volumes that warrant signalization occur, consistent with the guidance provided in the Manual on Uniform Traffic Control Devices (Federal Highway Administration 2012). The traffic volumes on Alpine Meadows Road in the existing plus project and cumulative plus project conditions would not meet the signal warrants. Further there is sufficient sight distance along Alpine Meadows Road to ensure that turning movements could be made safely. Thus the project

would not result in any adverse environmental effects that could be reduced or avoided by requiring signalization or provision of a turning lane at the project site entrance.

2.4.6 Cumulative Scenario

Comments on the Draft EIR question if the Traffic Impact Analysis considered several future development projects, including White Wolf, the Village at Squaw Valley Specific Plan, Martis Camp, the Homewood Resort Master Plan, and buildout of vacant lots in Alpine Meadows Valley.

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. The cumulative traffic impact analysis for the Alpine Sierra Subdivision relied on the second approach by using projections from adopted regional planning documents. As stated in the Traffic Impact Analysis (Draft EIR Appendix E1) and the Draft EIR, the traffic volumes at the State Route 89/Alpine Meadows Road intersection in the cumulative scenario were determined by applying an average annual growth rate of approximately 0.92%, based on the SR 89 Transportation Corridor Concept Report (Caltrans 2012). This did not specifically consider any of the projects mentioned in the comments on the Draft EIR. In addition, the traffic volumes on Alpine Meadows Road in the cumulative scenario were determined by applying an annual average growth rate of approximately 0.6%, which reflects ongoing development of vacant lots within Alpine Meadows Valley.

The Village at Squaw Valley Specific Plan cumulative traffic forecasts were prepared subsequent to preparation of the Alpine Sierra Subdivision cumulative traffic analysis. The Village at Squaw Valley cumulative forecasts included consideration of most of the cumulative projects mentioned in comments on the Draft EIR (the White Wolf project was not included in the projections because at the time that the Village at Squaw Valley Specific Plan analysis was prepared, the White Wolf project was not a reasonably foreseeable project as discussed further in Master Response 12). The Village at Squaw Valley cumulative traffic forecasts included the Alpine Sierra project and other reasonably foreseeable projects in the region, as documented in Table 18-2 of the Village at Squaw Valley Specific Plan EIR (County of Placer 2015). LSC compared the cumulative traffic volume forecasts used in the Alpine Sierra Subdivision Traffic Impact Analysis to those reported in the Village at Squaw Valley Specific Plan EIR and found that the winter traffic volumes used in the Alpine Sierra Subdivision Traffic Impact Analysis were slightly higher than but comparable to the projections used in the Village at Squaw Valley Specific Plan EIR while the summer traffic volumes in the two analyses were generally comparable. In some cases the summer volumes identified in the Village at Squaw Valley Specific Plan EIR were higher than those used in the Alpine Sierra Subdivision EIR, but not substantially higher. LSC concluded that even if the highest volumes from each EIR, for both summer and winter conditions, were applied to each intersection approach, this would not be expected to trigger any LOS impacts at the SR 89/Alpine Meadows Road intersection, or at the site access intersection (Final EIR Appendix E4).

In conclusion, the Alpine Sierra Subdivision analysis of cumulative impacts appropriately relied upon one of the two permissible methodologies defined in the CEQA Guidelines – the adopted planning document projections method. Further, this method yielded similar results to the analysis prepared for the Village at Squaw Valley Specific Plan EIR that relied upon the other of the two permissible methodologies – the list of past, present, and probable future projects method.

2.4.7 Vehicle Miles Traveled in the Tahoe Basin

Comments requested quantification of the number of vehicle miles that residents of and visitors to the Alpine Sierra Subdivision would travel within the Tahoe Basin. The Basin is defined as beginning at a point on State Route 89 south of Alpine Meadows Road and north of Fir Crags Road. LSC estimated the vehicle miles traveled (VMT) by identifying likely destinations and determining the travel distance within the Basin to reach those destinations. It is expected that the greatest number of trips from the project would be made to and from the Tahoe City area because Tahoe City provides the closest shopping, dining, commercial, and recreational opportunities in the Basin. Other destinations include Incline Village/East Shore, Kings Beach/Crystal Bay, West Shore, Emerald Bay, and South Lake Tahoe. LSC determined the number of project-generated trips that would be made within the Basin based on the trip distribution pattern identified in the Traffic Impact Analysis and Draft EIR. LSC estimated that the proposed project would generate approximately 62 one-way trips to and from the Basin over the course of a busy winter day and 144 one-way trips on a busy summer day. As shown in Table C in the 2018 Supplemental Memo (Final EIR Appendix E4), LSC calculated that Alternative A's daily contribution to VMT within the Basin would be 484 miles in winter and 1,379 miles in summer. The total contribution would be slightly less under Alternative B because it would generate fewer total daily trips than Alternative A (Final EIR Appendix E4).

LSC also compared the project-generated VMT to the existing and targeted Basin-wide VMT, finding that basin-wide VMT is currently approximately 1,937,070, which is less than the TRPA's adopted threshold standard of 2,030,938 VMT. The proposed project would result in an increase of approximately 0.07% on a peak summer day. This is considered to be a minimal increase and it would not cause basin-wide VMT to exceed TRPA's adopted threshold (Final EIR Appendix E4).

2.5 Master Response 5 Emergency Response and Evacuation

Comments on the Draft EIR state that the EIR does not adequately consider accessibility of the project site for emergency responders, the ability of future residents to evacuate the site and the project area, and the effect of the project on evacuation for existing residents. Comments also state that the proposed mitigation is not sufficient to address these concerns.

2.5.1 Accessibility in Winter

Comments question the ability of emergency responders to access the Alpine Meadows valley during peak traffic periods when snow accumulation has resulted in 6 to 8 foot tall snow banks on each side of Alpine Meadows Road. The proposed project would not alter the width of Alpine Meadows Road or the amount of snow accumulation and associated size of snow banks. As discussed in the Draft EIR and summarized in Master Response 4, the proposed project would not substantially increase traffic volumes or traffic congestion on Alpine Meadows Road. Thus the project would not alter the ability of emergency responders to access the project site or existing residences and other structures in the Alpine Meadows valley.

2.5.2 Fire Hazard Reduction

Comments state that the requirement for the project applicant to purchase a new fire truck for the North Tahoe Fire Protection District (NTFPD), as provided in Mitigation Measure 14.1a, is not sufficient because the Alpine Meadows fire station is not staffed year-round. It is correct that the fire station is staffed for a minimum of 150 days annually. Recently, additional staffing was made possible with grant funding; however this funding may not be available to the NTFPD every year. Typically the fire station is fully staffed during summer and autumn months when the threat of fire is highest, with reduced staffing in winter and spring when wildland fire is unlikely. Thus it would be fully staffed in the seasons with the greatest potential for wildfire. The NTFPD was consulted during preparation of the Draft EIR to verify the District's need for and available capacity to use a new fire engine.

In addition, as stated on Draft EIR page 14-1, the NTFPD operates five other fire stations and is a member of the Eastern Placer County Joint Powers Authority, which provides mutual aid and a shared radio repeater and equipment purchases between other member fire districts. The California Department of Forestry and Fire Protection (CalFire) is responsible for lands within Squaw Valley and the undeveloped U.S. Forest Service lands east of the Alpine Sierra Subdivision project site.

In addition to the purchase of a new fire engine, there are project design features and other mitigation measures that address fire hazards and reduce the potential for evacuation to be necessary. The project is proposed to include full interior sprinklers for all new structures, use of fire-resistant building materials, and implementation of the Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided as Final EIR Appendix J2). These project design features would reduce the likelihood of the site being affected by a wildfire. The Forest Management and Fuel Reduction Plan calls for removal of the thick understory of shade-tolerant fir that occurs throughout the site, noting that "in some locations [the understory] is impenetrable and creates extensive fuel ladders to the mid- and upper canopy." The Forest Management and Fuel Reduction Plan also calls for tree removal and thinning. Implementation of the Forest Management and Fuel Reduction Plan would reduce the intensity and speed of spread of any wildfires that do occur onsite. As part of its service agreement with the Alpine Springs County

Water District (ASCWD), the project would also construct improvements to ASCWD's existing water service infrastructure to improve fire flow and pressure in service zones 2 and 3, which currently do not meet State minimum fire flow requirements (see Draft EIR Sections 14.1.4, 14.3.2 - Impact 14.1 and Impact 14.7). These improvements would benefit existing non-project residences by ensuring that existing system deficiencies are corrected and minimum fire flow requirements are met.

Draft EIR Mitigation Measure 14.1b requires the project applicant to make a fair-share contribution toward the cost of upgrading three of the Alpine Springs County Water District's system-wide pump stations (Booster Pumps B, C, and D). This would ensure that there is adequate water supply and pressure to serve the proposed project and would increase water supply reliability and pressure throughout the Alpine Springs County Water District's service area. This would improve the ability of the NTFPD to fight fires within the water district's service area and thus would improve fire protection services for existing residents.

Comments on the Draft EIR suggested that a mitigation measure should be included to require the project applicant to fund two new full-time fire fighters for NTFPD and that those personnel be staffed at the Alpine Meadows fire station year round. NTFPD has reviewed the project plans, the Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2), the Emergency Preparedness and Evacuation Plan (EPEP, updated version provided in Final EIR Appendix J3), and the proposed mitigation measures. NTFPD has indicated that the project, including the project design features and mitigation measures, would not result in a need for two new full-time fire fighters because the proposed mitigation measures and design features would be effective at reducing the potential for wildfire within the project site and that the service impacts created by the project would be effectively mitigated by the project funded offsite improvements including the purchase of a Type I pumper truck fire engine and improvements to the Alpine Springs County Water District treated water delivery system.

2.5.3 Emergency Communications

Subsequent to publication of the Draft EIR, the project applicant and County continued to consult with the NTFPD regarding providing additional fail safe emergency response capabilities to the project site and implementation of the proposed EPEP. Based on that consultation, the EPEP has been updated to provide more details on wildfire education and public communication measures that would be implemented as part of the proposed project. The revised EPEP is provided in the appendices section of this Final EIR (Appendix J3). The updates include requirements that the Homeowner's Association (HOA) prepare and distribute to homeowners a quick-reference guide to the EPEP, provide all homeowners with a copy of the NTFPD Emergency Preparedness and Evacuation Guide and the Alpine Sierra EPEP, and establish and maintain communication protocols to allow the HOA to maintain communication with emergency service providers and to disseminate updated information to property owners on an ongoing basis, and during emergencies.

Revised section 4.1.6 of the EPEP describes the communication system that would be installed as follows:

"In addition, the entire Alpine Sierra subdivision will be equipped with a radio-based notification system, which will be designed, installed and operated in accordance with specifications provided by the NTFPD. The core of the system, including a radio transformer and antennae will be housed in one of the HOA buildings or another location approved by the NTFPD. Each home will have a hard-wired receiver with battery backup that transmits alerts from the notification system. The NTFPD will have access to the system, and will transmit alerts during emergency situations. To the extent feasible, other homeowners within Alpine Meadows may be able to install receivers in their homes, at the home owners' expense, and connect to the Alpine Sierra notification system."

To implement this requirement, the project proposes to install a National Informer Transmitter, which is a tone-operated system through which individual receivers that would be located in each home within the project would receive direct transmissions from the NTFPD office in Tahoe City. The transmitter would be constructed by the applicant prior to recordation of the first Final Map (or funded by the applicant and constructed by the ASCWD). The transmitter is proposed to be located adjacent to the existing Alpine Springs County Water District's Water Tank 2, which has a 30-foot diameter, is 32 feet tall, and is located 150 feet north of Chalet Road immediately adjacent to the southeast boundary of the project site. The transmitter would be located inside of an existing Public Utility Easement and would be owned by the Alpine Springs County Water District. The transmitted equipment and a backup generator would be housed in an approximately 120-square foot concrete block building, with a height of 9 feet, and painted a similar dark green color as the existing tank. Power and telephone connections would be extended from the existing water pump and control system vault that serves the adjacent water tank.

The transmitter would require an antenna mast extending from the ground adjacent to the side of the new transmitter enclosure. The antenna tower would be a 28-foot tall lattice structure and a 4-foot tall antenna would be attached to the top of the mast. The antenna tower would be placed on a separate foundation directly adjacent to the transmitter enclosure. No guy line would be required. The transmitter would be hard wired through the existing phone lines directly to NTFPD Tahoe office, which would allow for direct communication to the transmitter from the NTFPD command center. The system would also be available for use by the Placer County Sherriff's Office and the Office of Emergency Services.

Remote activation of the transmitter would tone-activate radio units placed within each of the project residences and would allow NTFPD to broadcast emergency information to people within the project site regarding the status of any forest fires and whether evacuation or shelter-in-place is recommended or mandated. In addition, non-project residences within other portions of the community could purchase and install radio receiver units and receive the same emergency notifications. In the event of a wildfire, CalFire, the Eastern Placer County Joint Powers Authority,

and NTFPD would constantly monitor fire conditions and provide instructions to people within the project site when voluntary evacuations are recommended, if evacuations become mandatory, and if evacuation is not feasible for any reason, including due to the location or direction of the fire and due to roadway congestion. In the case that evacuation is not feasible, NTFPD would instruct people at the project site to take shelter in the shelter-in-place facilities, as discussed further in Master Response 10.

2.5.4 Evacuation

Comments state that evacuation is the only way to protect the lives of those caught in a significant wildfire, and that evacuation from the project site would be constrained because there is only a single point of access to Alpine Meadows Road. Comments also state that evacuation is preferable to shelter-in-place.

The Draft EIR and the proposed EPEP (updated version provided in Final EIR Appendix J3) recognize that the County's zoning ordinance requires two points of access and that Road A exceeds the maximum allowable length of a dead-end road that serves residential development. The fire hazard reduction measures discussed previously were incorporated into the project design and EIR mitigation measures to ensure adequate emergency preparedness measures are implemented; these provisions would ensure adequate advance notification in the event of an emergency and timely notice of evacuation orders. Furthermore, shelter-in-place facilities were incorporated into the project design to ensure that people within the project site can be protected from fire hazards in the event that evacuation is not possible or where NTFPD determines that shelter in place is necessary (e.g., fire threat is not imminent at one location but is at another and roadways need to remain free-flowing to ensure orderly evacuation). The ability to shelter in place in the event that evacuation is not possible allows for additional contingency in the event of a wildfire and provides a higher level of emergency preparedness than is typically available for existing residential areas.

The comments state that the traffic impact analysis does not reflect the peak levels of traffic congestion on Alpine Meadows Road and in the region. Several comments noted that the drive between the Alpine Meadows Ski Area lodge and the Town of Truckee can take up to two hours on a busy ski weekend and the drive between the lodge and Tahoe City can take up to 90 minutes and that the EIR does not reflect the Level of Service F conditions that occurs at the State Route 89/Alpine Meadows Road intersection during those peak periods. As discussed in Master Response 4, the traffic impacts analysis is based on the 30th highest traffic volumes, rather than the maximum volumes. This is consistent with the County's standard approach to traffic impacts analyses, and is consistent with the practice of many other land use agencies regionally and statewide. Because the 30th highest peak hour traffic volumes are used to calculate impacts, it is true that peak hour congestion would be worse than the level reflected in the Traffic Impact Analysis during the 1st highest through 29th highest peak hours. A portion of these peak hours

would occur during winter, when the risk of wildfire is low and the need for evacuation is extremely unlikely.

Comments state that the addition of traffic generated by the proposed project would exacerbate congestion on Alpine Meadows Road and State Route 89 in the event of an evacuation. Further, comments state that this effect would be compounded with the additional traffic from buildout of the Village at Squaw Valley Specific Plan. As discussed in Master Response 4, the cumulative scenario traffic volumes and analysis reflect the transportation conditions likely to occur with buildout of the Alpine Sierra Subdivision and the Village at Squaw Valley Specific Plan. As shown in Draft EIR Table 15-3, the intersection of State Route 89 and Alpine Meadows Road is expected to operate at LOS B in the winter and LOS A in the summer under Alternative A in the cumulative scenario. With a total of 53 dwelling units in Alternative A and 43 dwelling units in Alternative B, the project would be expected to add between 43 and 80 vehicles to Alpine Meadows Road and State Route 89 in the event of an evacuation.

Comments state that the EIR should include a mitigation measure requiring the project applicant to find a second access point to the project site, such as by obtaining an easement over U.S. Forest Service lands. Through consultations with the project applicant and County, the U.S. Forest Service has indicated unwillingness to grant such an easement. The project applicant also conducted extensive negotiations with the neighboring Beak Creek Association HOA, which ultimately voted against granting an easement for access from the project site onto John Scott Trail, the only other location where the project could feasibly obtain secondary access. Due to topography, existing development surrounding the project site, and unwillingness of the neighboring land owners to grant an easement, it is not feasible to provide a secondary access to the project site.

Discussion of the proposed Shelter-in-Place provisions for the project is provided in Master Response 10.

2.6 Master Response 6 Noise

Comments on the Draft EIR state that the noise impacts analysis does not reflect the degree to which noise travels through the valley and echoes, particularly with respect to construction noise, and therefore the analysis does not adequately evaluate impacts to neighboring subdivisions. Comments also recommend that the noise impact modeling should have included additional modeling locations, state that the impact analysis does not address the Alternative B project, and question how mitigation measures will be enforced.

2.6.1 Noise Conditions in Alpine Meadows Valley

While it is true that sound can travel far and echo in valleys, sound levels decrease rapidly as the distance from the noise source increases. For example, the discussion on page 8-11 of the Draft

EIR compares the projected noise levels from traffic on Road A with the noise levels from traffic on John Scott Trail, from the perspective of the existing homes in the Bear Creek Association subdivision. As stated in the Environmental Noise Assessment (Draft EIR Appendix F) and the Draft EIR, the nearest offsite building façade closest to Road A would be approximately 170 feet from the proposed Road A centerline while the building façades closest to John Scott Trail are approximately 40 feet from the centerline. The analysis finds that "With the greater distance between the noise source and the existing residences, noise from single-event pass-bys of vehicles on the existing John Scott Trail are predicted to be between 7 and 13 [decibels (dB)] louder than single-event vehicle pass-bys on proposed Road A at the existing residences on John Scott Trail."

As summarized on Draft EIR page 8-14, the primary noise sources associated with the proposed project are vehicles and general residential activity noises, such as children playing. The Environmental Noise Analysis was prepared by collecting existing noise level data in the project area during both winter and summer seasons, identifying noise sources within the proposed project, calculating the noise levels that would be generated by project activities, and determining the increase in ambient noise levels for existing residents in the vicinity. As stated on page 5 of the Environmental Noise Assessment and page 8-2 of the Draft EIR, there are no substantial sources of noise in the project vicinity and the ambient noise in the area is "defined primarily by light traffic on Alpine Meadows Road during non-ski seasons, and by heavier traffic and resort activity during the winter ski season."

The County's adopted maximum allowable noise levels, which are documented in Section 8.2 of the Draft EIR and shown in Table 8-4, serve as the significance thresholds for determining when noise levels would be significant. The noise level standards are defined in terms of the day/night average noise level (Ldn). As stated on page 8-2 of the Draft EIR, "the Ldn is based on the average noise level over a continuous 24-hour period, with a +10 dB weighting applied to noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.)." Table 1 in the Environmental Noise Assessment demonstrates that actual noise levels in the project area vary throughout the day and vary from day to day. For example, at noise monitoring site 1, the average summer Ldn was determined to be 48 dB even though the noise measurements showed that maximum noise levels reached as high as 89 dB. In addition to the maximum allowable noise levels defined in the County's General Plan and County Code, the noise level increases identified in Table 8-3, which were developed by the Federal Interagency Committee on Noise, also serve as significance thresholds for determining when an increase in noise levels would be significant.

The noise analysis concludes that under either Alternative A or Alternative B the transportation noise levels would be below the Federal Interagency Committee on Noise criteria presented in Table 8-3 and would not result in a noticeable increase ambient noise at sensitive receptors in the project area. The Draft EIR comments have not provided any evidence or analysis demonstrating that the noise levels reported in the Environmental Noise Assessment and Draft EIR are incorrect or inaccurate. The EIR correctly identifies existing and future noise levels in the project area and

determines the significance of those noise levels by comparing them to adopted standards. The ability of sound to travel and echo through the valley does not affect the results of the Environmental Noise Assessment.

2.6.2 Construction Activity Noise

Comments on the Draft EIR state that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period and that it is not reasonable for the County to exempt construction activities from noise thresholds when construction activities may occur over multiple years. Comments request that the EIR provide noise level estimates that reflect the conditions that would be expected under different construction scenarios, such as differing numbers of dwelling units under construction at one time, quantify the noise levels associated with large equipment needed to construct roads and bridges, quantify noise levels associated with blasting, and evaluate the impacts from summertime construction on the Bear Creek Association pond and neighborhood. Comments also request clarification regarding how the construction mitigation measures would be enforced.

It is not expected that the project would require 20 years to reach full buildout. However, if the construction period were extended, this would indicate that fewer lots were being developed each year. There would be less construction activity occurring at one time, which would reduce the maximum daily noise levels associated with construction. Although construction noise is typically exempt from the County's noise level standards, the Environmental Noise Assessment and Draft EIR quantify the noise levels generated by construction activities and equipment. On page 8-15, the Draft EIR states "Activities involved in construction would generate maximum noise levels ranging from 85 to 90 dBA at a distance of 50 feet." Construction activities would occur a minimum of 110 feet from existing residences in the Bear Creek Association subdivision, thus maximum construction noise levels at the nearest existing residences would be less than 84 dB. Once construction of the backbone infrastructure by the project developer is complete, the level and location of construction activities occurring within the site would be dependent on market conditions and actions by individual lot owners. As construction activities move throughout the project site, the noise levels at each individual existing residence would change. No single existing residence would be exposed to the maximum construction noise level throughout all construction activities onsite. Because the location of the noise source is critical to determining the noise levels that would be experienced at a single offsite location, it is not possible to estimate noise impacts to existing residences based on the number of units under construction at one time.

Further, it is important to note that noise levels are expressed on a logarithmic scale and do not increase in a linear fashion. A doubling of sound energy results in a 3 dB increase in the noise level. If a single piece of equipment is producing 60 dBA at 50 feet and another piece of the same equipment (with the same sound level) is turned on, then the resulting sound level at a location 50 feet from each source will not be 120 dBA (60 dBA + 60 dBA). Instead due to the logarithmic

scale the resulting sound level would be 63 dBA because the sound energy has doubled and the sound level increases by 3 dB.

As shown in Table 10 in the Environmental Noise Assessment, blasting typically generates a noise level of 94 dB at a distance of 50 feet. Due to the distance between the project site and the nearest existing residences and considering the short-term nature of blasting activities, it is not expected that blasting would create a substantial increase in ambient noise levels in the project area.

Mitigation Measures 8.4a through 8.4e specify that the requirements of those measures be identified as notes on the project's Improvement Plans. This is a standard approach to mitigation measure implementation. The Improvement Plans are the detailed plans that a developer must submit to the County to obtain a grading and/or building permit. The construction contractors are required to implement the Improvement Plans precisely as they are drawn, including complying with any notes pertaining to how construction activities are carried out. This is enforced with County inspections of the construction site and the County's response to any formal complaints made regarding the construction activities.

Impacts to the Bear Creek Association pond would not occur during construction or occupation of the proposed residences due to the distance between the pond and the project site. While there may be some amount of additional noise that is audible from the pond, there would not be a substantial increase in noise levels at that location. As discussed on pages 22 and 23 of the Environmental Noise Assessment (Draft EIR Appendix F) noise from Road A would be lower than the noise from existing traffic along John Scott Trail and is expected to be less than 46 dB, which is well below the County's maximum allowable noise for residential land uses of 60 dB. Since the Bear Creek Association pond is further away from Road A than John Scott Trail and is screened from the project by topography, vegetation, and existing residences along John Scott Trail, noise levels at the pond from Road A would be less than 46 dB and would be within the County's maximum allowable noise for residential land uses of 60 dB.

2.6.3 Noise Monitoring Locations

Comments questioned whether the selected noise monitoring locations accurately reflect noise levels experienced by existing residences. As shown in Draft EIR Figure 8-1, there are three noise monitoring locations – one is on Alpine Meadows Road slightly north of the project site boundary, one is in the portion of the project site where the western development pod is proposed, and the third is within the project site boundaries directly north of the Stanford Alpine Chalet condominiums. These locations best represent the noise levels to which people within the project site would be exposed but also help characterize the noise levels occurring and the noise levels projected to occur at the existing residences north and south of the project site. Noise levels at the existing residences would be expected to be slightly higher than the noise levels measured at the two onsite locations because of the proximity of those residences to existing roads.

2.6.4 Alternatives

Comments state that the noise analysis only evaluates Alternative A and does not provide specific analysis of Alternative B. As discussed in Impact 8-1, the traffic generated by Alternative A would result in less than significant impacts to existing dwelling units in the project area. Alternative B has fewer dwelling units and similar but slighter lower levels of traffic, and would therefore generate the same or less noise. Since the impacts of Alternative A related to increases in traffic noise levels are less than significant, and the impacts of Alternative B would be the same or less than the impacts of Alternative A, there is no need to quantify the noise levels specific to Alternative B. As discussed in Impact 8-3, operational activities, such as use of the onsite recreation facilities, operation of the sewer lift station, and use of snow removal equipment along the roadways within the project site. These activities would be the same under both alternatives and impacts to the ambient noise levels for existing residences would remain less than significant.

2.6.5 Cumulative Scenario

Comments on the Draft EIR state that the noise analysis should consider construction noise during a 20-year buildout in light of other projects in the cumulative scenario, such as White Wolf, the Squaw Valley to Alpine Meadows gondola, and the Village at Squaw Valley Specific Plan.

The Village at Squaw Valley is topographically separated from Alpine Meadows valley. Because there is no line of sight between Alpine Meadows valley and Squaw Valley, construction under the Village at Squaw Valley Specific Plan would not create noise levels that could contribute to significant noise impacts within Alpine Meadows valley. As discussed in Master Response 12 regarding the assumptions for the cumulative scenario, the County properly excluded the White Wolf project from the cumulative scenario because it was not a reasonably foreseeable project at the time that the environmental analysis for the Alpine Sierra Subdivision began. However, if it had been included in the cumulative scenario, this would not have affected the conclusions of the Environmental Noise Assessment. Noise generated from use of the White Wolf project site would not be expected to increase noise levels within the Alpine Sierra project site or other neighboring residential areas due to the distance between the proposed White Wolf subdivision lots, the proposed Alpine Sierra Subdivision lots, and the existing residences in the area. Further, while the White Wolf project would be expected to contribute to increases in the noise levels associated with traffic on Alpine Meadows Road in the cumulative scenario, the increases due to the Alpine Sierra project would remain below the applicable thresholds of significance, and the contribution of the Alpine Sierra project to cumulative noise impacts would remain less than cumulatively considerable and therefore less than significant. Specifically, as shown in Draft EIR Table 15-4, noise levels along Alpine Meadows Road are expected to be approximately 60 dB in winter and range from 48 dB to 57 dB in summer. Alternative A would generate approximately 277 new daily vehicle trips on Alpine Meadows Road and was found to increase the cumulative noise level by a range of 0 to 0.1 dB in winter and 0 to 2.2 dB in summer. The White Wolf project proposes to construct 38 dwelling units, thus it would be expected to generate a similar or slightly reduced volume of traffic

compared to the Alpine Sierra project and would also be expected to increase the cumulative noise level by 2.2 dB or less. If the White Wolf project were added to the projected cumulative noise levels, the noise along Alpine Meadows Road in winter would remain at approximately 60 dB, consistent with the analysis in the Draft EIR. The proposed Alpine Sierra project would contribute an additional 0.1 dB to the cumulative noise level, as shown in Table 15-4. This increase in noise level is too small to be audible by sensitive receptors along alpine Meadows Road, thus even if the White Wolf project is included in the cumulative impacts analysis, the contribution of the Alpine Sierra project would constitute a less than significant impact. Similarly, the total noise level along Alpine Meadows Road in summer would be expected to remain below 60 dB and thus the cumulative impacts would remain less than significant.

2.7 Master Response 7 Hydrology and Water Quality

Comments on the Draft EIR requested clarification regarding the preliminary drainage report, the specific Low Impact Design (LID) and Best Management Practices (BMPs) that would be used onsite to manage stormwater runoff, whether the project would contribute to degradation of water quality in the Truckee River or could decrease groundwater recharge in the area, and whether the project would result in any hydrologic changes.

2.7.1 Preliminary Drainage Report

Comments questioned the reasonableness of relying on a preliminary drainage report that was prepared for a project design that varies from Alternative A and Alternative B. The Preliminary Drainage Report is provided in Draft EIR Appendix I1. The intent of the preliminary drainage report is to characterize the scale of potential drainage and water quality impacts to inform development of the hydrology and water quality management strategy for a given project. As noted in the memo regarding the adequacy of the preliminary drainage report for evaluating the impacts of Alternative B (Draft EIR Appendix I2), the drainage report can be used to evaluate the impacts of both project alternatives because it "makes findings on a scale sufficiently large, and the comparative projects will have sufficiently similar impervious area." This conclusion is also applicable to the minor differences between the project design on which the drainage report was based and Alternative A. It is typical that the design of a project's preliminary drainage improvements, as shown on a Tentative Map and described in the preliminary drainage report, will be refined during the review of Improvement Plans for the Final Map, at which time the final drainage report is required to be completed and the drainage improvements designed to a construction level of detail.

A Preliminary Drainage Report is adequate for evaluating the potential impacts of a proposed project. When a project is approved, the developer is required to submit Improvement Plans for all improvements that will be constructed with the final map for review and approval by the County. The Improvement Plans provide construction-level detail plans for grading, paving, and construction of site improvements. The developer is also required to submit a Final Drainage

Report, which provides specific details of the design, sizing, and placement of water quality BMPs. Submittal of the Improvement Plans and Final Drainage Report allow the County to review the final project design and confirm that the drainage analysis reflects the proposed site-specific conditions. This is consistent with the text of Mitigation Measure 12.1b, which states "The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two."

Consistent with the County's standard development review process, Draft EIR Mitigation Measures 12.1a and 12.1b require submittal of Improvement Plans and a Final Drainage Report, and identify minimum performance standards that must be achieved in each. This includes requirements for the Improvement Plans to show revegetation of disturbed areas and erosion control (Mitigation Measure 12.1a) and for the Final Drainage Report to include BMPs to minimize erosion, water quality degradation, and discharge of pollutants to stormwater in compliance with the East Placer Storm Water Quality Design Manual (Mitigation Measure 12.1b). In addition, several other mitigation measures identify project design and water quality performance standards that must be reflected in the Improvement Plans and Final Drainage Report. For example, in reviewing the Improvement Plans and Final Drainage Report, the County would verify that the drainage from snow storage areas is directed towards onsite water quality facilities as required by Mitigation Measure 12.2d; and the County would verify that the project design achieves the requirement in Mitigation Measure 12.3b that any increase in flows to Bear Creek must be no greater than 2 cubic feet per second.

Further, as discussed in Draft EIR Section 1.5, the County would verify compliance with all conditions of approval and mitigation measures prior to approval of Improvement Plans. This ensures that project construction cannot proceed until the County has verified that the Improvement Plans and Final Drainage Report meet the performance standards identified in these mitigation measures and that the project's impacts to drainage and water quality would remain less than significant.

When construction is proposed on individual lots, the project's Architecture Review Committee would be responsible for ensuring that building plans comply with the Architecture Handbook (Draft EIR Appendix B3), which is applicable under either Alternative A or Alternative B. If the Alternative B project is approved, the Architecture Review Committee would also ensure that individual lot development plans comply with the project's Development Standards (Draft EIR Appendix B4). These documents include requirements for use of temporary (construction period) and permanent BMPs to manage stormwater and protect water quality. Further, prior to issuing grading and building permits for each individual lot. Placer County would ensure that the site plans demonstrate compliance with the County's *East Placer Stormwater Quality Design Manual* and *Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection* and the California Stormwater Quality Association's *Stormwater Best Management Practice Handbooks for New Development and*

Redevelopment. Compliance with these regulatory and guidance documents would ensure that individual lot development does not create construction-period impacts to drainage and water quality.

Comparison of Project Designs

As stated in the Executive Summary of the Preliminary Drainage Report (Draft EIR Appendix I1) the project design on which the drainage report was based is the proposed Alternative A. It includes 33 single-family lots and 14 half-plex lots. This is consistent with the description of alternative A provided on pages 3-7 and 3-8 of the Draft EIR and shown on Draft EIR Figures 3-4 and 3-5. Alternative A would include 27 single-family lots on the eastern portion of the project site, with separate guest facilities on up to five of these lots, and 20 lots in the western portion of the project site, of which 14 would be half-plex sites and 6 would be custom cabin home sites. Thus Alternative A provides a total of 33 single-family lots and 14 half-plex lots, consistent with the project evaluated in the Preliminary Drainage Report. In comparison, Alternative B proposes 27 lots on the eastern side (of which 5 could have secondary dwelling units) and 10 custom cabin lots on the western side. A Technical Memo was prepared for the Alternative B project by the project engineer which describes differences between the two alternatives and the applicability of the preliminary drainage report to this alternative (Draft EIR Appendix I2). Thus, both alternatives have been sufficiently evaluated for preliminary design of drainage and stormwater treatment improvements and would have comparable amounts of impervious surfaces.

Further, the amount of land disturbance necessary to construct the two different project designs (Alternative A and Alternative B) would be comparable. As stated on Draft EIR page 12-16, construction activities under Alternative A would affect approximately 25.9 acres of the site, leaving 21.4 acres undisturbed. Draft EIR page 12-18 states that approximately 23.8 acres of the project site would be disturbed during construction of Alternative B, leaving 23.5 acres undisturbed.

2.7.2 Changes in Drainage Due to Vegetation Removal

Comments questioned whether the drainage report calculations reflect the potential effects of tree clearing for defensible space leading to an earlier melting of snowpack. As discussed in Master Response 3, Biological Resources, the tree removal contemplated under the proposed Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided as Final EIR Appendix J2) would occur within four zones, with complete removal of trees only within 5 feet of all structures and decreasing levels of removal as distance from structures increases. The result would be a thinning of forest vegetation that would slightly increase the amount of sunlight falling on accumulated snow that would primarily occur in areas proximate to the developed features within the project site where the greatest amount of vegetation removal and thinning occurs. The LID and BMP measures required to be included in individual lot development, as well as the stormwater quality treatment infrastructure that would receive runoff from snow storage areas

would capture the majority of any increase in snowmelt associated with vegetation removal. It is noted that the project site is located on north and northwest-facing slopes which limits the amount of solar exposure to the site, particularly in winter.

The preliminary drainage study for the proposed project considers the rate and volume of stormwater runoff from the project site during the peak flow condition, which was determined to occur during 100-year winter storm conditions with snowmelt and no infiltration (Draft EIR Appendix I2). The slight increase in sunlight resulting from thinning forest vegetation would be an effect that would be present during all of winter conditions and would generally have the greatest effect in areas proximate to the developed features within the project site, where runoff would be routed through LID and BMP stormwater treatment infrastructure. The 100-year floodplains along the Truckee River are a result of drainage from many subwatersheds in the region during a 100-year storm event. The Truckee River watershed is described on Draft EIR page 12-2. The watershed includes 1,190 square miles; the project site is located within the Bear Creek Valley subwatershed which includes 3,600 acres. The effect of the slight increase in sunlight resulting from vegetation removal within the approximately 47.3-acre project site on snowmelt within the 3,600-acre Bear Creek Valley subwatershed would not substantially alter runoff volumes from the project site or within the subwatershed and thus would have no effect on the 100-year floodplains.

2.7.3 LID and BMPs

Comments requested more details regarding the specific LID and BMP measures that would be implemented onsite, whether those measures are reflected in the drainage report, how the slopes and soils of the project site influence which LID and BMP measures can be used, and the effectiveness of such measures.

Draft EIR Appendix B1 provides the proposed Tentative Subdivision Map for Alternative A and Draft EIR Appendix B2 provides the proposed Tentative Subdivision Map for Alternative B. Each tentative subdivision map includes a grading and drainage plan, which indicates the specific BMPs proposed. These include level spreaders, which help to slow down the rate of run-off from adjacent roads, infiltration trenches, vegetated swales, and culverts to convey drainage under roads. In addition, Draft EIR page 12-17 identifies that other BMPs that may be implemented to control construction-period drainage and water quality include "silt fencing, sand bags, fiber rolls, stabilized construction entrances, sedimentation basins, drain inlet protection, stabilized construction accesses and material management, and other soil stabilization measures." Mitigation Measure 12.1c requires that the project developer prepare a Stormwater Pollution Prevention Plan (SWPP), which will identify the proposed BMPs, including their design and placement on the project site. Examples of the construction-period BMPs are provided on Draft EIR page 12-18. Mitigation Measures 12.1d and 12.2a further require that all water quality treatment facilities and BMPs be designed according to the guidance of the California Stormwater Quality Association's Stormwater Best Management Practice Handbooks for New Development and Redevelopment and

the County's Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection; and that the BMP plan meet applicable requirements of the County's Phase II NPDES municipal stormwater quality permit. These requirements identify the performance standards that must be achieved by the project's Improvement Plans to ensure that drainage and water quality impacts remain less than significant. The County would ensure that the project design complies with the East Placer Storm Water Quality Design Manual through review of the final drainage report submitted with Improvement Plans, prior to issuance of grading permits, and would ensure that construction plans for individual residences comply with these requirements prior to issuance of building permits and prior to final inspection approval and issuance of certificates of occupancy.

For development of individual lots, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), which would be applicable to both Alternative A and Alternative B, requires that each lot includes temporary and permanent BMPs in compliance with the County's guidelines. Examples of the BMPs anticipated by the Architecture Handbook are provided in Draft EIR Figure 12-2. Under Alternative B, the additional Development Standards (Draft EIR Appendix B4) require that LID measures be implemented. These include infiltration trenches and slotted drip line drains to ensure that water runoff from impervious surfaces on each lot infiltrates into the ground directly adjacent to the surfaces.

Mitigation Measure 12.1b requires that the specific BMPs and LID measures used at the site must be consistent with the East Placer Storm Water Quality Design Manual. This manual was developed specifically to address the conditions in the eastern Placer County area, which includes the slopes and soil types present at the project site. The manual defines the minimum design criteria for these BMPs and LID measures to ensure their effectiveness. Further, Mitigation Measure 11.2d requires that the project applicant "submit to the ESD a letter of credit or cash deposit in the amount of 110% of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices." This funding provides the County with the ability to ensure that any modifications or repair to erosion control improvements will be made if necessary to improve the effectiveness of these measures. If any of the erosion control measures fail, such as if vegetation does not become established in areas that are required to be revegetated, the County would require the project developer to correct those measures.

2.7.4 Sedimentation

Comments state that the Draft EIR should be more specific as to potential for the project to impair the health of Bear Creek and the Truckee River watershed by contributing sediment to these waterways. As discussed previously, the preliminary drainage report found that the project could result in a slight increase in drainage to Bear Creek, with a maximum increase of 2 cubic feet per second, in accordance with Mitigation Measure 12.3b. All runoff from the project site would first be routed through the BMPs and LID measures discussed above. This would remove sediment

from the runoff such that the project would not create any additional significant sediment loading to Bear Creek and the Truckee River.

2.7.5 Groundwater Recharge and Hydrologic Changes

Comments state that the surface water flows within the project site can contribute to groundwater recharge in the project region, noting that this can be observed on the project site because water in some of the intermittent drainages appears to travel below ground surface. Comments also question whether project construction or operation could reduce the quantity of water within the on-site wetlands and drainages or alter the timing of water flows in these features, leading to changes in flows in Bear Creek or the natural springs in the area, which could then alter the Bear Creek Association pond and Alpine Meadows pond and could alter drinking water sources for the Alpine Meadows valley.

The proposed project would not divert any of the existing flows within the onsite drainages or within Bear Creek. Thus the project would not reduce the quantity of water within the wetland and drainage features onsite. As stated in the Supplement to the Preliminary Drainage Report (Draft EIR Appendix I2), the project would increase runoff to downstream locations by between 0% and 0.41%. The Supplement to the Preliminary Drainage Report describes these increases as "very small and considered negligible and within the tolerances of the calculations." The Supplement to the Preliminary Drainage Report also notes that the project could slightly increase runoff to Bear Creek (limited to no more than 2 cfs under Mitigation Measure 12.3b). This would not alter the activity of the natural springs in the area and would not decrease flows to the Bear Creek Association pond or Alpine Meadows pond.

The Supplement to the Preliminary Drainage Report (Draft EIR Appendix I2), also found that the proposed bridge over Bear Creek and the four proposed bridges over the onsite tributary would not result in any changes in offsite floodplain elevations, including at the upstream and downstream modeling locations furthest from the bridge location. Thus, the project would not result in any hydrologic changes associated with the 100-year floodplain.

As stated on page Draft EIR 12-6, "Gravel soils, cobbles, and boulders suggest a limited ability of site soils to support groundwater recharge via percolation of surface water. Groundwater was not encountered in test pits excavated during the on-site investigation conducted for the geotechnical report." Thus, development of the project site would not lead to a reduction in groundwater recharge in the project region.

The project would receive water supply from the Alpine Springs County Water District (ASCWD). As discussed in Chapter 14, Public Services and Utilities, ASCWD obtains water from seven groundwater wells, six of which are used to supply potable water. The EIR evaluated the potential for the project's use of groundwater to adversely affect flows in Bear Creek and the Truckee River. As stated on Draft EIR page 14-30, meeting the water demand for the proposed project could

"reduce monthly flows in Bear Creek by a maximum of 3.8% during the late summer and early fall, with negligible effects at all other times of the year. This is a conservative estimate in that it assumes that the average demand will come at the expense of overflow to the stream. In actuality, tank storage may be available to meet the demand, and snowmaking ponds may intercept storage overflow. This reduction would have no discernable effect on Truckee River flows, with project demand equal to less than 0.03 percent of Truckee River flows (near Truckee) at most." The Draft EIR concludes that this would constitute a less than significant impact to the Truckee River watershed.

Since there would be no substantial change in water quality and quantity, the project would not alter groundwater recharge or hydrologic features in the project region.

2.8 Master Response 8 Snow Storage

Comments on the Draft EIR state that the EIR incorrectly identifies the annual snowfall in the region, does not demonstrate that there is sufficient space for snow storage in heavy snowfall years, and does not address the potential for snow storage to adversely affect neighboring properties.

2.8.1 Annual Snowfall

The Draft EIR relies on the data from the Natural Resources Conservation Service, National Water and Climate Center Snow Telemetry (SNOTEL) measurements and data from the Western Regional Climate Center to identify the annual snowfall in the region. As stated on Draft EIR page 6-2, precipitation measured at the Tahoe City Cross SNOTEL site averaged 36.3 inches annually, ranging from 11.4 inches to 64.3 inches from 1981 to 2014 and snowfall averages 208.2 inches annually, but has been recorded as high as 401.4 inches at the Truckee Ranger Station. In addition, the Tahoe City station SNOTEL data for October 2015 through August 2018 shows a maximum snow depth of 50 inches on March 17, 2018, 87 inches on March 6, 2017, and 35 inches on February 1st and 2nd, 2016 (WRCC 2018). The comments on the Draft EIR that assert these values are not correct do not provide other data sources that differ from the data provided in the EIR.

2.8.2 Snow Storage

Placer County's standard requirement for snow storage for projects east of Donner summit is to provide a 20-foot wide snow storage easement on both sides of a County-maintained road. Based on the proposed length of public roads within the project site, this would require 197,453 square feet of space within the snow storage easement. This requirement is met in most locations throughout the proposed project. The proposed snow storage easements are shown on the Tentative Subdivision Map for both project alternatives provided in Draft EIR Appendix B. Snow would not be stored adjacent to Bear Creek and the intermittent drainages onsite, adjacent to the existing Stanford Alpine Chalet properties north of the project site, or adjacent to Alpine Meadows

Road. To replace the snow storage that is not accommodated in those locations, additional snow storage is provided in other locations within the project site. The project provides approximately 237,518 square feet within the snow storage easements. This exceeds the County's minimum requirement as the total roadway surface area from which snow removal would be required is approximately 219,560 square feet (TLA 2018).

The Homeowner's Association would be responsible for routine snow removal activities throughout the winter and spring. As required by the proposed Emergency Preparedness and Evacuation Plan (EPEP, updated version provided in Final EIR Appendix J3) the Homeowner's Association employee, who would live onsite in the HOA employee housing unit, would use snow removal equipment (such as a front loader) to maintain onsite roads to be clear of accumulated snow. The EPEP requires that the snow removal equipment be stored within the project site at all times.

As snow is removed from roadways and deposited within the snow storage easement, the snow would compact and condense, which reduces the total surface area needed for storage. Based on the County's standard snow storage requirement and experience with other developments in the project region, it is expected that the proposed snow storage easements would provide sufficient storage capacity for most years. In heavy snow events or heavy snow years, snow storage may also occur on an as needed basis in common area portions of the project site, such as Lot A, Lot C, Lot E and Lot G.

All drainage from the snow storage areas would be routed to water quality treatment facilities as part of the project's overall water quality management, as discussed in Master Response 7.

2.8.3 Snow Storage Affects to Neighboring Properties

As discussed on Draft EIR page 13-24, "roadway snow removal would result in vertical and horizontal mixing of snow on the downslope side of the road into uneven-aged snowpack (discontinuity), which counteracts formation of slab avalanche conditions." Thus snow storage on the downhill side of Road A would not increase the risk of avalanches affecting downslope properties. As discussed above, there is sufficient space within the snow storage easements to accommodate snow storage in most years, and additional snow storage would be possible within common lots in the project site. Further, the project's Conditions of Approval will include a condition prohibiting snow storage on offsite properties. Therefore, the neighboring properties would not be affected by the snow storage needs of the proposed project.

2.9 Master Response 9 Fuel Management and Fire Safety

Comments on the Draft EIR identify concerns regarding fire safety. These include requesting clarification of whether fire resistant building materials would be used, suggesting that outdoor fire pits should be prohibited within the project, requesting more information regarding the high

fire risk in the area and the fire protection resources available to the area, stating that Mitigation Measure 13.1 (which requires, in part, the project applicant to purchase a new fire engine for the North Tahoe Fire Protection District) is insufficient to reduce the project's impacts, and stating that the EIR does not evaluate fire hazards in the cumulative condition.

Comments regarding the biological impacts of vegetation management are discussed in Master Response 3, comments regarding emergency evacuation and access to the project site are addressed in Master Response 5, and comments regarding the Shelter in Place concept are addressed in Master Response 10.

2.9.1 Forest Management and Fuel Reduction Plan

The Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided as Final EIR Appendix J2) prescribes vegetation removal and thinning treatments that would be implemented throughout the project site. The plan calls for removal of the thick understory of shade-tolerant fir that occurs throughout the site, noting that "in some locations [the understory] is impenetrable and creates extensive fuel ladders to the mid- and upper canopy." This plan was prepared by a Registered Professional Forester with experience in the Sierra Nevada implementing defensible space programs. Additionally the plan has been reviewed by the North Tahoe Fire Protection District and the District concurs with the forest management and fuel reduction programs described in the plan and would ultimately be responsible to verify its implementation and operation if the project is approved and constructed.

The plan identifies four zones of vegetation management and detailed performance standards that must be met within each zone. These standards are listed on Draft EIR pages 13-15 through 13-17. In summary, all flammable material, such as wood piles, pine needles, and mulch, within 5 feet of any structure (the Fire Free Zone) would be removed (low-growing, well-irrigated shrubs that do not touch the structure may be grown in this zone). Vegetation thinning would be required at further distances from the structures. Under both alternatives, the Structural Protection Zone extends 30 feet beyond each building and includes the Fire Free Zone. This zone would cover 24 acres of the site. In this zone, vegetation thinning would be required to limit the vertical and horizontal connectivity of trees. The Defensible Space Zone extends 100 feet from the Structural Protection Zone or to the property line, whichever is greater, and would cover approximately 12 acres of the project site. In this zone, some tree thinning is required while the focus is on trimming and pruning to remove ladder fuels and removal of surface fuels such as forest litter, fallen limbs, and trunks (those that are not embedded in the forest floor). The final zone is the Wildland Fuel Reduction Zone, which extends an additional 100 to 200 feet or more from the Defensible Space Zone and covers an additional 9 acres of the project site. Variable-density thinning would be used in this zone; this approach results in small areas of dense vegetation between areas that are opened up by thinning and removing vegetation. Pruning would be done to remove smaller diameter (10 inches or less) trees, shrubs, and limbs. This zone would include removal of ladder fuels, and thinning trees such that the residual canopies are spaced 15 feet apart.

Implementation of the Forest Management and Fuel Reduction Plan would ensure that defensible space principles are met within the project site. This would reduce the intensity and speed of spread of any wildfires that do occur onsite.

Once the project is built out, ongoing efforts to maintain defensible space would not require any discretionary approvals from Placer County, and thus would not be subject to additional environmental review. As discussed in Master Response 3, the County's Tree Preservation Ordinance exempts removal of trees when done in accordance with a fuel reduction/fire safety/fire protection program. Thus, long-term compliance with the Forest Management and Fuel Reduction Plan would be administered by the Homeowner's Association under the direction of the NTFPD and would not require tree removal permits for approved fuel management activities.

2.9.2 Building Materials and Project Design

The proposed Architecture Handbook provided in Draft EIR Appendix B3 establishes standards for building materials and other project design elements to minimize the risk of homes burning during a wildfire that affects the project site.

Section 4-15 of the Architecture Handbook provides a brief summary of the defensible space requirements for individual homeowners, stating "Defensible space practices alter vegetation by increasing the moisture content, thinning or removing high fire prone native plant material, shortening the height and altering the arrangement of potential fuels." This section requires homeowners to demonstrate to the Alpine Sierra Planned Community Design Committee how their property would be consistent with these defensible space practices. This section also notes that in addition to vegetation management, homes should reduce fire risk by having a fire-resistant roof, ensuring that addresses are readily seen from the street, covering all exterior house vents with ember-resistant venting in accordance with building code requirements, having a screened spark arrestor within all chimney caps, using only EPA-approved fireplaces, and removing all tree limbs within 10 feet of spark arresters.

Section 5-6 of the Architecture Handbook defines allowable building materials and states "fire resistive materials are preferable given the environment but must be harmonious in color and texture. Treated wood products (shingles) can be used in a fire resistive assembly. Large scale log houses are not allowed but log elements can be used as architectural features." In addition, the proposed Emergency Preparedness and Evacuation Plan (EPEP, updated version provided in Final EIR Appendix J3) requires that all structures be constructed with fire-resistant building materials and include automatic fire sprinklers. Specifically, Section 4.1.3 of the EPEP requires that homes meet the following design and construction requirements:

- Ignition and ember resistant building materials;
- Sprinklers under eaves and decks;
- Interior sprinklers;

- Fire-safe landscaping adjacent to buildings;
- Ember-resistant venting; and
- Class A or metal roofs.
- Wood shingles, irrespective of fire rating, will not be allowed

Moreover, all homes will be constructed in accordance with the requirements of the Uniform Building Code and California Building Code Chapter 7A requirements (Wildland Urban Interface Code regulations).

Finally, Section 5-11 of the proposed Architecture Handbook requires that outdoor fire pits be placed in a patio or terrace where the prevailing wind will not blow flames in the direction of the home or the vegetative landscape, be plumbed for propane or natural gas, and include a device such as ceramic logs must be included to discourage wood-burning. Further, as stated on Draft EIR pages 3-9 and 9-17, the project-specific development standards and conditions of approval would prohibit installation of wood burning devices indoors or outdoors for all of the residential units and Homeowner's Association facilities. The risk that an outdoor fire pit could provide a wildfire ignition source is reduced with implementation of the Vegetation Management and Fuel Reduction program as described above.

2.9.3 Mitigation Measures

Refer to the discussion of Mitigation Measures 14.1a and 14.1b in Master Response 5, Emergency Response and Evacuation. In summary, comments raised concern that staffing limitations at the Alpine Meadows fire station would decrease the effectiveness of the requirement for the project applicant to purchase a new fire truck for the North Tahoe Fire Protection District (NTFPD), as provided in Mitigation Measure 14.1a. Typically the fire station is fully staffed during summer and autumn months, with reduced staffing in winter and spring. Thus it would be fully staffed in the seasons with the greatest potential for wildfire. The NTFPD was consulted during preparation of the Draft EIR to verify the District's need for and available capacity to use a new fire engine. This mitigation measure would work in concert with Draft EIR Mitigation Measure 14.1b which requires the project applicant to make a fair-share contribution toward the cost of upgrading three of the Alpine Springs County Water District's system-wide pump stations (Booster Pumps B, C, and D). This would increase water supply reliability and pressure throughout the Alpine Springs County Water District's service area, which would improve the ability of the NTFPD to fight fires within the water district's service area and thus would improve fire protection services for existing residents.

Refer also to Master Response 5 for a discussion of the suggestions in the Draft EIR comments that the applicant should fund two new full-time fire fighter positions; and discussion of the communication system that would be installed in each home within the proposed project and would also be available to existing residences in the vicinity.

2.9.4 National Forest Land

Comments on the Draft EIR stated that the project site is adjacent to Tahoe National Forest land, where currently there are no vegetation management or fuel reduction plans being implemented. While the proposed project would provide for fuel reduction within the project site and thus would reduce the risk of wildfire to the extent feasible, it would benefit the project and all existing residences in the vicinity if fuel management activities were undertaken where National Forest land borders developed areas. However, this concern is not unique to or caused by the proposed project and therefore this is not a responsibility of the proposed project. It is noted that the North Tahoe Fire Protection District and U.S. Forest Service have been in consultation to develop a program to allow for fuel management within the Tahoe National Forest land adjacent to the project site and that the applicant has tentatively agreed to partner with those agencies on fuel reduction programs in those locations where the project directly interfaces with national forest service lands, where feasible, if programs are approved and in place at the time of project implementation.

2.9.5 Cumulative Impacts

Refer to Master Response 12 for discussion of the projects included in the cumulative scenario. No other development projects were proposed within the Alpine Meadows valley at the time that the EIR commenced. White Wolf is now proposed, which would add an additional 38 homesites that rely on access from Alpine Meadows Road. It is expected that the White Wolf project would be required to implement a site-specific fuel management program to reduce the potential for wildfire on that property, similar to programs incorporated into this project.

2.10 Master Response 10 Shelter in Place

Comments on the Draft EIR raised concerns about the Shelter in Place strategy described in the proposed Emergency Preparedness and Evacuation Plan (EPEP, updated version provided in Final EIR Appendix J3), stating that this strategy is an inadequate substitute for evacuation. Specifically, comments stated that the opportunity to effectively use Shelter in Place is limited, this strategy is only feasible in a fire of short duration, and that people within the project site would be likely to choose to evacuate rather than shelter in place. Comments request clarification of whether the project's Architectural Handbook requires use of fire-resistant materials and that the EIR provide an assessment of different fire scenarios and the associated public safety responses. Comments also question the placement of the Homeowners Association facility that would serve as the Shelter in Place location adjacent to diesel gasoline storage tanks. Comments state that the County Planning Commission should not allow any deviation from the County Zoning Ordinance and conclude that the proposed Alpine Sierra development does not meet minimum emergency standards.

2.10.1 Emergency Preparedness and Evacuation Plan

Please refer to Master Response 5 regarding updates to the EPEP based on consultation between the project applicant, County, and North Tahoe Fire Protection District (NTFPD) that has occurred subsequent to public circulation of the Draft EIR. Based on that consultation, the EPEP has been updated to provide more details on wildfire education and public communication measures that would be implemented as part of the proposed project. The updated EPEP is provided as Final EIR Appendix J3. Revised section 4.1.6 of the EPEP describes the communication system that would be installed as follows, as discussed in Master Response 5. This communication system will be a critical component of emergency responses at the project site. It would allow NTFPD to provide immediate direction to residents and visitors within the site in the case of an emergency. This would include notifying individuals when a wildfire is active in the vicinity, when voluntary evacuations are suggested, when evacuation orders become mandatory, or if using the Shelter-in-Place facilities is necessary.

Section 4.1.3 of the EPEP identifies the specific fire-resistance building requirements for the Shelter-in-Place facilities. These include:

- Exteriors shall be constructed of ignition-resistant materials in accordance with 701A of the California Building Code;
- Air-filtration and ventilation systems shall be designed to accommodate residents when out-door air quality is compromised due to smoke etc.;
- Smoke control shall include filtered air with positive pressurized building interiors;
- Exterior sprinklers shall be installed;
- Emergency power and heat shall be provided;
- Ember resistant venting shall be used; and
- All roofs, including metal roofs, shall be Class A construction.
- Wood shingles, irrespective of fire rating, will not be allowed.

Additionally, the EPEP notes that the area surrounding the Shelter-in-Place facilities would be subject to stringent vegetation management, as described for the Structural Protection Zone in the Alpine Sierra Forest Management and Fuel Reduction Plan. This Zone requires vegetation management "such that fuels are reduced to the extent that crown fires will not propagate within this treatment area. In addition, due to the road clearing, the equipment yard and natural clearings, there will be an additional level of tree removal in proximity to these buildings that will exceed those dictated by the Structural Protection Zone. In short, there will be limited trees, if any, within a 100-foot radius of these buildings."

The EPEP also requires that onsite electrical generators be located in a shed or other structure adjacent to the Shelter-in-Place buildings to provide backup power in the event of a power outage.

Back-up power generators are anticipated to use propane, while small amounts of diesel fuel would be stored onsite to provide fuel for the Homeowner's Association snow removal equipment. Improvement Plans for the Homeowners Association facilities, including the Shelter-in-Place buildings and accessory structures would be reviewed by NTFPD prior to issuance of building permits to ensure that fuel storage is located appropriately to provide power to the Shelter-in-Place building without causing a potential explosion or ignition risk. As noted in the Architecture Handbook, all propane storage tanks would be located below ground.

Sufficient water supply for the approximately 2 hours that the shelter would be occupied is available by gravity flow from the Alpine Springs County Water Districts tank system. The Homeowner's Association would also ensure that emergency supplies, including food, bottled water, blankets, and first aid supplies are kept on-site and replaced as needed.

The Shelter-in-Place buildings would be constructed concurrent with Phases B and C of project development. For residences constructed in Phase A, if a wildfire occurs and residents must take refuge rather than evacuate, the EPEP anticipates that Phase A residents will take refuge at the Alpine Meadows Ski Resort parking lots, consistent with the Alpine Meadows Community Wildfire Protection Plan. The parking lots cover approximately 14 acres, which is large enough to accommodate approximately 1,600 cars and therefore would be more than sufficient space to accommodate the residents and visitors within Phase A.

Comments state that people would prefer to evacuate. While this is true, the project design and mitigation measures ensure that Shelter in Place is a viable option. Further, this allows NTFPD the ability to more effectively manage regional fire response and ensure that evacuations are managed to ensure orderly evacuation. The Shelter-in-Place facilities would be built with ignition-resistant materials and would have appropriate air-filtration and ventilation to allow people to safely occupy the buildings in the event of a wildfire and an inability to evacuate. This includes individual residences, which will be constructed to nearly identical shelter in place standards as the HOA facility. With education ahead of time, as described in Section 4.1.6 of the EPEP, and use of the emergency communication system during a fire, fire protection personnel could provide residents and visitors with instruction on the appropriate measures to take to maximize personal safety.

Comments cited the examples of the 2017 fires in the Santa Rosa area. It is noted that many of those structures were constructed between the late 1970s and early 1990s and did not use fire resistant building materials, vent screening, or chimney cap spark arresters to reduce the chance of ignition. One comment letter included a photograph showing a meatal-construction building that burned, and suggested that this building was fire-hardened. The photograph does not provide any direct evidence to support an assumption that the building was fire-hardened or constructed to be fire resistant. If it were constructed to be fire resistant but burned anyway, there are a number of reasons why that could have happened – such as if any doors or windows were left open. The

experiences in Santa Rosa do not demonstrate that Shelter-in-Place is infeasible or ineffective. Moreover, fire safety in wildland areas should not be limited to single-response strategies, such as evacuation, as even under the best of circumstances evacuation is not always feasible. Therefore secondary response measures, such as sheltering in place within buildings designed to a substantially higher level of fire resistance and defensibility, are a necessary and prudent component of modern emergency preparedness and response strategies. The emergency preparedness measures incorporated into this project were developed in consultation with the serving fire agency, which has determined these measures to be a prudent and responsible approach to development in areas subject to risk of wildland fire.

2.11 Master Response 11 Avalanche Hazards

Comments on the Draft EIR state that the EIR should document whether the project has the potential to increase avalanche hazards onsite or offsite, including by considering if blasting or tree removal that may be needed during construction would affect avalanche risks, whether the placement of Road A or other project features could alter avalanche hazard areas, whether snow storage within the project site could alter avalanche hazard areas, and how avalanche conditions could change in the future due to climate change.

2.11.1 Exacerbation of Avalanche Hazards

Avalanche risks associated with the proposed project are evaluated in impact 13.2 in Chapter 13, Hazards. The analysis is based on the Avalanche Hazard Study (Draft EIR Appendix J1) prepared for the site. As discussed in the Avalanche Hazard Study and on Draft EIR pages 13-22 through 13-25, there are four Potential Avalanche Hazard Areas (PAHA) within the project site: PAHA P1 is located at the project site access onto Alpine Meadows Road; PAHAs P2 and H1 are located near the rock outcroppings in the center of the property; and PAHA P3 is located in the southeast corner of the property.

As reported in the Draft EIR, the Avalanche Hazard Study reached the following conclusions for each of the PAHAs:

- Construction of the proposed project would not alter the likelihood that an avalanche would occur in PAHA P1 and would not change the frequency or size of avalanches that could affect the area. It is also noted that the March 1982 avalanche is the only avalanche that ran as far as the property entrance.

- Construction of Road A across PAHA P2 would significantly decrease the runout distance of avalanches from PAHA P2's slope and may decrease or eliminate avalanche activity (Draft EIR Appendix J1). This would occur because construction of the roadway would cut through the head of the avalanche starting zone, effectively disrupting and partially eliminating the portion of the PAHA where dangerous slab avalanches would

develop. In addition, roadway snow removal would result in vertical and horizontal mixing of snow on the downslope side of the road into uneven-aged snowpack (discontinuity), which counteracts formation of slab avalanche conditions.

- PAHA H1 is located in the eastern portion of Lot 2 and the western and central portion of Lot 3 of Alternative A. Under Alternative A this area would be graded and the rock outcropping removed thereby eliminating the potential for avalanche. Under Alternative B, the preferred project, Lots 2 and 3 are proposed to be configured such that the H1 potential avalanche path is split between the lots, with a portion of the rock outcropping occurring on each lot and the H1 path would not encroach on proposed building envelopes for either lot. Under either alternative, Mitigation Measure 13.2b requires that the building design recommendations contained in the Avalanche Hazard Study be applied to Lot 2 and Lot 3 to ensure that impacts associated with avalanches would be reduced to less than significant.

- Under either Alternative A or Alternative B, no construction would occur in the area of PAHA P3 and no changes to avalanche risks associated with this location would result.

As demonstrated in the Draft EIR and Avalanche Hazard Report, the proposed project would not increase the risk, frequency or size of avalanches in the project vicinity and would not expose existing residents or roadways, including John Scott Trail, in the area to new or increased avalanche hazards.

Blasting that may be needed for project construction would occur during summer and autumn months when there is no substantial snow accumulation. Thus blasting during construction would not increase avalanche hazards.

Comments on the Draft EIR inquired whether the tree removal and snow clearing in the area of PAHA P2 and snow removal at the project site entrance as required under Mitigation Measure 7.3a would increase avalanche risk, particularly for downslope neighbors. The area of PAHA P2 contains rock outcroppings with very little trees. Any vegetation thinning required under the Forest Management and Fuel Reduction Plan (updated version provided as Final EIR Appendix J2) would not substantially change conditions in this area. As noted in the Draft EIR, snow removal and storage lessens avalanche risk because the snow becomes more compact when it is disturbed and deposited in storage areas. This is applicable to both locations – PAHA P2 and the project site entrance. Snow removal and storage activities in these locations would not expose downslope neighbors or roadways to increased avalanche hazards or snow creep caused by snow removal activities from Road A.

Comments on the Draft EIR also inquired whether climate change could increase avalanche risks. As discussed in the Avalanche Hazard Report, it is expected that climate change would generally

lead to warmer temperatures, more rainfall and less snowfall, higher snow levels and decreased snowpack. These conditions would reduce the overall avalanche potential and associated risks.

2.12 Master Response 12 Cumulative Scenario

Comments state that the cumulative impacts analysis in the Draft EIR does not appropriately consider all probable future projects, which results in deficiencies in the analysis of cumulative impacts associated with traffic, noise, visual resources, and fire protection.

2.12.1 CEQA Requirements

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document.

2.12.2 Draft EIR Cumulative Scenario

Draft EIR page 15-2 defines the criteria for determining whether a project should be considered a reasonably foreseeable project for the purposes of the cumulative impacts analysis. This includes project that meet the following parameters at the time of circulation of the Notice of Preparation:

1. Are partially occupied or under construction;
2. Have received final discretionary approvals;
3. Have applications accepted as complete by local agencies and are currently undergoing environmental review; or
4. Are otherwise considered likely to be developed, based on historic development patterns, including the rate of development in the area.

The projects that meet these criteria are listed in Draft EIR Table 15-2.

As stated on Draft EIR page 15-8, the cumulative development scenario assumes that 101 new dwelling units would be constructed in Alpine Meadows valley. This was based on projections prepared by County staff in consideration of the development potential in the valley, which includes the approved but not yet constructed Alpine Knolls project, as well as the extent of vacant land and the Community Plan and zoning designations associated with vacant land. This development projection was then used within the traffic impacts analysis to predict background traffic levels in the study area, and the traffic levels projected for the cumulative scenario were used to develop the projected cumulative scenario noise conditions in the Alpine Meadows valley. The projections were also considered in determining whether there would be significant impacts in the cumulative scenario with respect to land use and planning, visual resources, biological resources, geology, hydrology, and public services. Thus the cumulative impacts analysis appropriately considers the nature and extent of impacts associated with past, present, and reasonably foreseeable development in the project region.

The White Wolf project was not included because the project applications were not filed prior to commencement of the environmental analysis for the Alpine Sierra Subdivision project. Although the initial project applications for this project were submitted in 2016, they were not deemed complete until April 2018, which is well after the Alpine Sierra Subdivision Draft EIR was published. It is typical that a project design will change throughout the process of revising and resubmitting project applications, or for applications to be withdrawn to allow for more substantial revisions after a preliminary review by County staff. Thus, it is common practice in CEQA compliance, and consistent with the CEQA Guidelines, to exclude from the cumulative scenario those projects that do not have a complete application at the time that environmental review commences. However, for informational purposes given the proximity of the White Wolf project to the Alpine Sierra site, the following discussion describes potential changes in cumulative impacts when both the Alpine Sierra Subdivision and the White Wolf projects are considered.

- Land use – The White Wolf project would add additional residential development to the region and would not interfere with or disrupt existing or planned land uses in the area.

- Visual – Residential development would be visible on the west side of Alpine Meadows Road. This would contribute to the significant cumulative impact to visual resources identified in the Draft EIR. However the contribution of the Alpine Sierra project to this impact would remain less than significant for the reasons discussed under Draft EIR Impact 15.1.

- Biological Resources – the White Wolf project would result in some loss of habitat and vegetation, however the White Wolf project site supports more rock outcrop areas and less forest than other areas in the Alpine Meadows valley. As discussed in the Draft EIR, compliance with local, state, and federal regulations related to protection of sensitive habitats, wetlands, and special status species would ensure that regional impacts to these resources in the cumulative scenario remain less than significant. The inclusion of the White Wolf project in the cumulative scenario would not change this conclusion.

- Transportation – While the White Wolf project was not specifically included in the growth projections for the Alpine Meadows valley, the 101 dwelling units assumed to be developed in the area under the cumulative scenario reflects the general development trends in the area and reflects expected buildout of the approved Alpine Knolls subdivision as well as other development in the valley. Thus a portion of the 101 dwelling units could account for the White Wolf project, which proposes 38 dwelling units. Further, the addition of 38 dwelling units to the valley would not be expected to substantially alter the traffic operations on Alpine Meadows Road or SR 89. The extent of traffic impacts associated with the White Wolf project would be comparable to those evaluated for proposed Alternative B. As shown in Draft EIR Table 15-3, the intersection of SR 89 and Alpine Meadows Road is expected to operate at level of service B in winter AM and PM

peak hours and at level of service A in summer PM peak hours. Alternative A, which includes 47 dwelling units was projected to add between 0.3 and 0.6 seconds of delay to the intersection, which would not alter the level of service for each peak hour. If the White Wolf project were added to the volumes reflected in the level of service determinations in Table 15-3, the No Project delays would be between 0.3 and 0.6 seconds greater than shown in that table. Then the proposed project would add an additional 0.3 to 0.6 seconds of delay. This would result in the following delays: 19.1 seconds in the winter AM peak hour, 17.9 seconds in the winter PM peak hour, and 9.8 in the summer PM peak hour. These increases in delay under the cumulative (including White Wolf) no project scenario and cumulative (including White Wolf) plus project scenario would not alter the level of service of the intersection and would not increase the relative contribution of the proposed project to the cumulative conditions. Thus the addition of White Wolf to the cumulative scenario would not alter the Draft EIR conclusions regarding significant cumulative traffic impacts and the significance of the proposed project's contribution to those impacts.

- Noise – as discussed in Section 2.6.5, the White Wolf project would not be expected to generate noise levels that would substantially alter the cumulative noise levels in the project region or the contribution of the Alpine Sierra project to cumulative noise impacts.

- Air Quality – the White Wolf project would be expected to contribute to air pollutant generation during construction and operation, including emission of pollutants for which the region is in non-attainment. However the White Wolf project would not alter the contribution of the Alpine Sierra project to cumulative air quality effects. As established in the Placer County APCD California Environmental Quality Act Thresholds of Significance Justification Report, the determination of whether a project would make a cumulatively considerable contribution to significant air quality cumulative impacts is made by comparing the project-generated emissions with the APCD's recommended thresholds, and does not require modeling or estimation of the emissions that would be generated by other reasonably foreseeable projects. The Justification Report states that a project that generates less than 55 pounds per day of ROG and NO_X and less than 82 pounds per day of PM_{10} would not make a cumulatively considerable contribution to significant cumulative air quality impact.

- Greenhouse Gases – the White Wolf project would be expected to generate greenhouse gas emissions during construction and operation. However the White Wolf project would not alter the contribution of the Alpine Sierra project to cumulative climate change effects. As established in the Placer County APCD California Environmental Quality Act Thresholds of Significance Justification Report, the determination of whether a project would make a cumulatively considerable contribution to the significant cumulative impact of climate change is made by comparing the project-generated emissions with the APCD's recommended thresholds, and does not require modeling or estimated estimation of the

emissions that would be generated by other reasonably foreseeable projects. The Justification Report states that a project that generates less than 1,100 metric tons CO2e per year would not make a cumulatively considerable contribution to the significant cumulative impact of climate change.

- Geology, Soils, Seismicity – the White Wolf project would occur in similar soils and geologic conditions as the proposed project. Both would involve soil movement and alteration of local topography. None of the earth moving activities within associated with either project would be expected to extend outside of the site boundaries. Therefore there would be no cumulative impact within the Alpine Meadows valley related to geology, soils, and seismicity.

- Hydrology and Water Quality – the Alpine Sierra Subdivision and the White Wolf project site are both located in the Bear Creek subwatershed. As discussed in Draft EIR chapter 15, projects must comply with local, state, and federal regulations that protect water quality and require development to implement best management practices to ensure that runoff rates and volumes do not increase as a result of development. Inclusion of the White Wolf project in the cumulative development scenario would not change the Draft EIR conclusion that regional impacts to water quality and surface runoff under the cumulative scenario remain less than significant because each project would comply with the applicable regulations.

- Hazards and Hazardous Materials – the White Wolf project site supports a large portion of the Potential Avalanche Hazard Area (PAHA) that extends on to Road A within the proposed Alpine Sierra project site. It is not known if development of the White Wolf project would alter the size, runout area, or likelihood of occurrence of avalanches within that PAHA. However, compliance with the Placer County General Plan and County Code, it is expected that Placer County would require project design measures, mitigation measures, and/or conditions of approval upon the White Wolf project that would ensure the project does not exacerbate the avalanche hazards for any offsite properties. Thus it is expected that if White Wolf were included in the cumulative scenario, there would be no change to the Draft EIR conclusion that cumulative impacts associated with hazards would remain less than significant.

- Public Services and Utilities – addition of the White Wolf project to the cumulative scenario would increase the total demands for public services and utilities in the project area. As documented in Draft EIR chapter 14, there is sufficient capacity within the area's public service and utility systems and infrastructure to accommodate ongoing development in the region. Thus it is expected that if White Wolf were included in the cumulative scenario, there would be no change to the Draft EIR conclusion that cumulative impacts associated with public services and utilities would remain less than significant.

Comments on the Draft EIR stated that the Tahoe Basin Area Plan, which was adopted by the Placer County Board of Supervisors on December 6, 2016 and by the Tahoe Regional Planning Agency Governing Board on January 25, 2017, should also be considered in the cumulative scenario. The Alpine Sierra Subdivision is located outside the Tahoe Basin and is not subject to compliance with the Tahoe Basin Area Plan. Moreover, the Alpine Sierra project is a relatively small-scale project that is not of regional significance and therefore would not typically be required to be considered within the cumulative context of a large Area Plan that does not govern its land use. While some of the effects of development of the project could result in a modest cumulative contribution to some resources areas when combined with the effects of development within the Tahoe Basin, the contribution does not appreciably add to the cumulative impacts where they would occur (e.g. traffic, air quality) or would not occur at all due to geographic distance (e.g. biological resources, hydrology).

2.12.3 Cumulative Visual Resource Impacts

Comments on the Draft EIR stated that the proposed Alpine Sierra Subdivision would contribute to cumulative impacts to views from the Five Lakes Trail. The analysis in Chapter 5, Visual Resources, and specifically the visual simulation provided in Figure 5-4B show that the proposed project would not result in substantial changes to the landscape characteristics visible from the Five Lakes Trail. The viewpoint shown in Figure 5-4B was selected because it provides the best view of the project site from the Five Lakes Trail. No portion of the White Wolf project site appears in that viewshed.

2.12.4 Cumulative Noise Impacts

Comments on the Draft EIR request clarification regarding the conclusion that there would be a significant cumulative noise impact but the proposed project would not make a cumulatively considerable contribution to that impact. The term “cumulatively considerable contribution” is taken from the CEQA Guidelines that provide direction on the methodology for considering cumulative impacts. This term recognizes that a cumulative impact may be significant when all of the reasonably foreseeable projects are considered, but that an individual project may have a minor contribution to that impact. In other words, if the individual project is not constructed, the cumulative impact would still occur as a result of other development in the region. This is the case with respect to noise impacts in the project region.

As shown in Draft EIR Table 15-4 and discussed on pages 15-12 through 15-14, a cumulative noise impact was identified due to an overall increase in the amount of traffic on State Route 89, which is expected to cause the ambient noise levels within 100 feet of that roadway to range between 66.1 and 66.6 decibels in the cumulative condition. The County’s maximum allowable noise level for residential land uses is 60 decibels. The cumulative impact is significant because the noise levels adjacent State Route 89 would exceed this maximum.

The Alpine Sierra Subdivision would not contribute to that impact because the volume of traffic generated by the project, approximately 277 daily trips under Alternative A and 243 daily trips under Alternative B, would not be sufficient to change the noise levels adjacent to State Route 89 with or without the project.

Table 15-4 also shows that noise levels adjacent to Alpine Meadows Road in the cumulative scenario are expected to reach between 60.0 and 60.9 decibels in winter and between 48 and 56.7 decibels in summer. The traffic generated by the proposed project would contribute up to 2.2 decibels to the summer noise levels and up to 0.2 decibels to winter noise levels. As these increases are lower than the significance criteria established by the Federal Interagency Committee on Noise as identified in Chapter 8, Table 8-3, the project's contribution to cumulative noise levels is less than cumulatively considerable.

2.13 Master Response 13 Alternatives

2.13.1 Co-equal Analysis of Alternative A and Alternative B

Comments on the Draft EIR regarding the analysis of project alternatives included questioning the approach of evaluating two alternatives throughout the EIR, identifying a preference for Alternative D, requesting additional description and analysis of Alternatives C1, C2 and D, and recommending a new alternative that would further reduce development within the project site.

As described on page 3-1 of the Draft EIR, the EIR evaluates the originally proposed project as Alternative A and a modified project design as Alternative B. Alternative B is analyzed at a co-equal level to Alternative A throughout the Draft EIR. The EIR description of Alternative A is consistent with the proposed tentative subdivision map and other project materials submitted by the project applicant. Alternative B was developed by the applicant team in consultation with County staff and the County's EIR consultant during preparation of the EIR with the intent of modifying the originally proposed project (Alternative A) to reduce or avoid environmental effects. This included changing residential densities in portions of the site, reducing the amount of potential avalanche hazard areas within the building envelope areas of private lots, modifying the grading and building height standards identified in the Architectural Handbook to reduce alteration of the natural landform and reduce visual impacts, and increase avoidance of sensitive biological resources. Because Alternative B would be capable of achieving most of the basic project objectives, is feasible to implement, and would reduce the environmental effects of the proposed project, Alternative B is a valid alternative to include the reasonable range of project alternatives. Because Alternative B is evaluated at a co-equal level to Alternative A and includes a comprehensive analysis of its potential impacts if constructed and operated, it could be acted on and approved if it is deemed preferable to Alternative A.

2.13.2 Alternatives Not Evaluated at a Project Level of Detail

CEQA allows that the analysis of project alternatives may be less detailed than the analysis of the proposed project. Specifically, CEQA Guidelines 15126.6(d) provides that the alternatives analysis should "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." This requirement is typically met by providing analysis that compares the impacts of an alternative to those of the proposed project, such as the analysis presented in Chapter 16 of the Draft EIR regarding Alternatives C1, C2, and D. However, this guidance does not preclude providing a higher level of detail in the analysis of a particular project alternative, such as was done for Alternative B. This practice is frequently used in CEQA compliance documents where there may be a need or desire to preserve the ability of the lead agency to approve either the proposed project or one of the alternatives, with no further need for additional environmental review. This is commonly referred to as evaluating co-equal or equal-weight alternatives, and is modeled after the typical approach to alternatives analysis under the National Environmental Policy Act.

CEQA requires that project alternatives selected for analysis be potentially feasible and that they achieve the basic objectives of the project while reducing one or more of the project impacts. The alternatives analysis does not require analysis of every conceivable alternative. The intent of the alternatives analysis is to foster informed decision-making by providing the public and decision-makers with an understanding of how the impacts of a proposed project would compare with the impacts of other feasible alternatives that could accomplish most of the basic project objectives. The Draft EIR meets this intent by describing and evaluating a reasonable range of project alternatives that have meaningful differences from the proposed project as well as each other alternative. The Draft EIR was properly made available for public review, and this Final EIR provides the necessary responses to all comments received. Thus, the Draft EIR does not subvert CEQA's informational and public participation requirements.

CEQA requires that an EIR consider a "no project alternative." CEQA Guidelines Section 15126.6(e)3.B states:

> "The 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment."

To meet this requirement, the EIR considers Alternative C1, in which no entitlements are granted for the project site and no development occurs, and Alternative C2, in which development that is consistent with the existing land use and zoning designations proceeds in place of the proposed project. Both alternatives comply with the CEQA Guidelines requirement to evaluate a no project alternative. While only one of these alternatives is required to be evaluated in the EIR, both versions of the no project alternative were considered to provide the public and county decision-makers with a reasonable range of project alternatives. Alternative C2 provides a conceptual representation of the development that could be realized within the project site under the existing land use and zoning designations. Although the design is similar to Alternative A, there are meaningful differences between the two. Alternative C2 would:

- Not alter any of the land use and zoning designations on the project site,
- Develop 2 fewer single-family lots in the western portion of the project site,
- Omit 1 single-family lot from the eastern portion of the project site, and
- Reduce the size of 1 single-family lot in the eastern portion of the project site.

Alternative D is described in the EIR as the Environmentally Constrained Alternative. This was intended to convey that the extent of development on the site was reduced to provide greater protection of environmental resources. Comments on the Draft EIR that identify a preference for this alternative highlight that in comparison to Alternatives A and B, Alternative D would:

- Increase protection and avoidance of environmentally sensitive areas including riparian and floodplain habitat
- Eliminate two of four stream crossings along the unnamed tributary within the eastern portion of the project site
- Increase the amount of total open space within the project site
- Reduce impervious surface areas, allowing for a greater amount of stormwater runoff infiltration

Comments are correct that Alternative D would have reduced environmental effects compared to Alternatives A and B. This is reflected in the Draft EIR in Sections 16.7.5 and 16.7.6 (Table 16-2). The analysis of Alternative D is comparative in nature rather than quantitative, consistent with the requirements and standards for alternatives analysis identified in CEQA Guidelines Section as discussed above. Comments assert that the Draft EIR provides only three sentences in its analysis of the reduced impacts of Alternative D. This is incorrect. The analysis of Alternative D spans 5 pages in the Draft EIR (pages 16-27 through 16-31).

As demonstrated above, Alternatives B, C1, C2, and D are each valid and appropriate alternatives under CEQA, and each contributes to the EIR's consideration of a reasonable range of alternatives. There are meaningful differences between each alternative and the proposed project (Alternative A), and the analysis of the four alternatives to the proposed project meets the intent under CEQA of "fostering informed decision-making" (CEQA Guidelines Section 15126.6).

Comments suggested an additional alternative that would develop only the 20 dwellings proposed in the western portion of Alternative A or to develop only the western portion of Alternative D, suggesting that these alternatives would reduce the visual impacts, length of project construction and associated noise impacts, traffic associated with the project, snow removal impacts on downhill residents and John Scott Trail, reduce fire evacuation risk, and reduce the amount of run-off into Bear Creek due to a shorter construction period and reduced construction footprint.

Comments are correct that the suggested project alternative would reduce the relative magnitude of changes in the viewshed from the Five Lakes Trail by avoiding all development on the eastern side of the project site. However, the development on the western side includes the higher density units, which appear as a larger mass of built features and where the visual effects of vegetation removal are more noticeable, as seen in Figure 5-4B. Thus the alterative would not substantially lessen this impact, which was determined to be less than significant. As discussed in Master Response 2, Visual Resources, Section 2.2.2, the proposed lots nearest to John Scott Trail are located a minimum of 140 feet from the roadway while Road A passes between 150 and 300 feet from John Scott Trail. Precluding development in the eastern portion of the site would avoid the potential for change in views from existing residences, however due to the distance between existing residences and the proposed lots within the project site, and the presence of white fir forest vegetation between the existing and proposed lots, the impact of the potential changes in view from existing residences was determined to be less than significant. Therefore, this alternative would not substantially lessen any significant visual impacts.

Similarly, the reduced the length of project construction would not substantially lessen noise impacts. As discussed in Master Response 6, the exposure of existing residents to construction noise is expected to result in a less than significant impact. Construction activities typically generate maximum noise levels of 85 dB at a distance of 50 feet from a receptor. The proposed lot nearest to existing residences is approximately 140 feet from John Scott Trail, while three other lots are approximately 200 feet from John Scott Trail. All other construction on the eastern portion of the project site would be more than 350 feet from the nearest existing residence, with line of sight between the construction activity and existing residences blocked or limited by the existing vegetation. This would reduce the construction noise exposure of those existing residents. The greatest potential for construction noise to exceed the existing ambient noise levels in the area is associated with construction on four lots, which would involve a relatively short duration of construction activities and this impact was determined to be less than significant. Precluding development on the eastern side of the project site would not substantially decrease the project's less-than-significant impacts associated with construction noise.

The reduced development under this alternative would also reduce the vehicle traffic generated by the project. Under both Alternative A and Alternative B, the project would have a less than significant impact on traffic conditions in the vicinity. It would not cause any intersections to operate at an unacceptable level of service. While development of fewer units would reduce the

total traffic volume associated with the project, it would not substantially lessen any significant impacts of the project.

As discussed in Master Response 8, Snow Removal, Section 2.8.3, snow storage on the downhill side of Road A would not increase the risk of avalanches affecting downslope properties and there is sufficient space within the snow storage easements to accommodate snow storage in most years, with additional snow storage possible within common lots in the project site.

The length of Road A necessary to serve the western portion of the project site exceeds the maximum allowable length for dead-end roads under the California Public Resources Code. Thus this alternative would still be subject to the same requirement for providing a second point of access as the proposed project. While the alternative would reduce the number of people within the site that may be exposed to risks associated with wildfire, it would not avoid the need for a second point of access, and therefore would require the same level of mitigation efforts as the proposed project. Specifically, this alternative would still require the shelter-in-place provisions, the increase in water pressure to meet fire flow requirements, the purchase of a new fire engine, and the provision of a communication system between the project site residences and NTFPD. Thus this alternative would not substantially reduce risks associated with the potential for the site to be affected by wildfire.

Commenters suggested that this alternative would reduce the amount of run-off into Bear Creek due to a shorter construction period and reduced construction footprint. However, the mitigation measures in Chapter 12, Hydrology and Water Quality, require implementation of Best Management Practices to ensure that construction and operation of the project does not substantially increase stormwater runoff; thus the reduced construction footprint would not improve the project's water quality and drainage impacts.

In addition to the inability of this alternative to substantially lessen any of the significant impacts of the proposed project, the alternative would not meet many of the basic project objectives. This alternative would develop 42% of the proposed lots under Alternative A and 53% of the proposed units under Alternative B, the applicant's preferred alternative. It would not include the large lots proposed for the eastern side of the project site or any of the project's five secondary dwelling units. These characteristics would impede attainment of the objectives related to developing the site consistent with the allowable density under the General Plan and zoning, creating a high-end subdivision of at least 38 units, achieving sufficient density to offset the high cost of infrastructure, and providing a mix of housing types and developing both large and small lots.

The suggested alternative would not be capable of substantially reducing any of the significant impacts of the proposed project and would not meet many of the basic project objective. Thus it is not necessary or appropriate to include this alternative as part of the reasonable range of alternatives.

2.14 Master Response 14 Project Merits

This Master Response addresses comments on the Draft EIR that raised concerns regarding the project merits. These include the appropriateness of the project objectives, whether the project brings any community benefits, and the project's relationship to the regional need for affordable housing.

Comments on the Draft EIR questioned project objectives included the objective to "provide large-lot single-family home sites to address the lack of supply of high-quality vacant home sites in the Alpine Meadows Valley." Commenters state that this objective is unnecessary because people could instead purchase an older existing home site, tear down the cabin and build a high-quality home, or purchase and build upon an existing vacant lot; and that this approach would allow for development of new homes while reducing the environmental effects within the valley. CEQA does not require that an EIR include analysis of the degree to which project objectives address community needs. The objectives are an expression of the project applicant's goals. The Planning Commission and the Board of Supervisors will consider the degree to which the project objectives meet community needs and the County's land use planning goals as part of their deliberations on the project.

The project objectives also include a statement regarding constructing homes within walking distance of the Alpine Meadows ski area. Commenters state that this objective is not realistic because the proposed homes would be located too far from the ski area for walking to be feasible. The Traffic Impact Analysis did not assume any reduction in trip generation rates for the proposed subdivision; thus the EIR concluded that traffic impacts do not depend on the attainment of this objective.

Commenters also stated that because the project would not provide any tangible benefit to the community the County should not allow the requested exceptions to development regulations regarding the provision of a second point of access. This is a policy decision that would be made by the Planning Commission and the Board of Supervisors and does not relate to the environmental impact analysis in the EIR. The environmental effects associated with the length of the on-site road and the lack of a second point of access are evaluated in the Draft EIR as discussed in Master Response 5, Emergency Response and Evacuation, Master Response 10 and Shelter in Place.

Finally, commenters stated that the project will not contribute to the region's affordable housing supply because the homes constructed onsite would be luxury homes and many would be used as second homes. It is correct that the proposed housing products are not intended to contribute to the region's affordable housing supply. However, the project would comply with Placer County General Plan policy C-2 pertaining to construction of employee by constructing an employee unit onsite for the Homeowner's Association staff person. This unit may be sized to accommodate one or two additional residents. Depending upon the ultimate configuration of the housing unit and the final number of bedrooms, any portion of the employee housing obligation not met on the

project site will be completed through payment of in-lieu fees to the County in compliance with Policy C-2.

The project's effects related to affordable housing and consistency with Placer County General Plan policy C-2 are evaluated in Draft EIR Chapter 4, Impact 4.1. The analysis on pages 4-12 and 4-13 document the number of fulltime equivalent employees in the Tahoe region that would be generated by activity associated with the proposed subdivision. The analysis discusses the ability of the on-site Homeowner's Association staff housing to meet a portion of that need, and requires the project applicant to implement Mitigation Measure 4.1a to provide additional employee housing through construction, dedication of land, and/or payment of an in lieu fee.

The comments summarized in this Master Response provide an opinion regarding the merits or qualities of the proposed project but do not address the content, analysis, or conclusions in the Draft EIR. These comments will be taken into consideration by the Planning Commission and Board of Supervisors when making decisions regarding the project but do not require any revisions to the Draft EIR or any additional response.

2.15 Individual Responses to Comments

As discussed on page 2-1, this section presents all of the written and verbal comments received on the Draft EIR and responses to those comments.

Comment Letter A1

Shirlee Herrington

From: Vogel, Ian <ian_vogel@fws.gov>
Sent: Tuesday, October 17, 2017 11:48 AM
To: Placer County Environmental Coordination Services
Subject: Alpine Sierra Subdivision Project

Dear Placer County Community Development Resource Agency – Environmental Coordination Services,

This email is provided in response to your request for comment on the Draft Environmental Impact Report (Draft EIR) for the Alpine Sierra Subdivision (proposed project). The U.S. Fish and Wildlife Service reviewed the Draft EIR, focusing on the potential for federally listed species to occur in the project area and on the potential adverse effects to listed species by the proposed project. The only listed species that may occur in the project area is the Sierra Nevada yellow-legged frog (*Rana sierrae*, SNYLF). This species is known to occur within 0.35 miles of the proposed project area.

Appendix D of the Draft EIR (Biological Survey Report) provides results of general biological surveys and an analysis of the habitats present in the project area. During these surveys, no SNYLF were observed and the report concludes that SNYLF suitable habitat does not occur within the project area. According to the Draft EIR, the project area contains a perennial stream, an intermittent stream, and multiple ephemeral channels. The general biological survey was not focused on amphibian species and these species can be very difficult to detect, especially at the tadpole and young-of-year life stages. In addition, surveys were conducted in 2012, a low-water year. Hydrological conditions may change dramatically from year to year, with habitat being present in some years and not others. Due to the site's location within the known range of SNYLF and within SNYLF designated critical habitat, we recommend that protocol level amphibian visual encounter surveys (VES) be conducted by a qualified biologist. VES should be conducted in either the spring or summer by a biologist that is familiar with the species' life history and habitat preferences. The qualified biologist may also conduct a site assessment to determine the habitat suitability within the project area. A1-1

We appreciate the opportunity to comment on the Draft EIR for the Alpine Sierra Subdivision Project. We welcome further discussion regarding the project's potential effects to SNYLF and would be happy assisting in any way we can.

Thank you,

Ian Vogel

--
Ian Vogel
Fish and Wildlife Biologist - Sierra/Cascades Division

Endangered Species Program
Sacramento Fish and Wildlife Office
U.S. Fish and Wildlife Service
(916) 414-6444

Response to Comment Letter A1

U.S. Fish and Wildlife Service
Ian Vogel
October 17, 2017

A1-1 The comment states that the only species listed under the federal Endangered Species Act as threatened or endangered that may occur in the project area is the Sierra Nevada yellow-legged frog (*Rana sierra,* SNYLF), which is known to occur within 0.35 miles of the project site. The comment states that although SNYLF was not observed during the biological resources assessment, the site contains drainages that could support the species, that the biological survey was completed during a low-water year, and that the biological survey was not focused on amphibian species, which can be difficult to detect. The comment recommends that protocol level amphibian visual encounter surveys should be performed.

Following consultation between Placer County, the applicant team and the U.S. Fish and Wildlife Service to develop draft measures for SNYLF visual encounter surveys, a joint field review of the project site was conducted in May 2018 by the consulting biologist and the U.S. Fish and Wildlife Service staff, accompanied by County staff and applicant representatives. The characteristics of the site and its water bodies have been compared to the published characteristics of SNYLF habitat, and it has been determined that breeding habitat likely does not occur within the site, but that potentially suitable breeding habitat occurs off site at a location that is seasonally contiguous with water bodies that extend through the project site. The proposed project would have the potential to result in direct impacts to SNYLF if a breeding population is present at an off-site location that is contiguous with on-site surface water during the summer (July and afterward) if individual frogs were to travel into the site along the contiguous water bodies to use the site for foraging. Text has been added to Chapter 6 of the Draft EIR to reflect this conclusion, as shown in Chapter 4 of this Final EIR. This includes text added to Section 6.1, Existing Conditions, and to Impact 6-1. Additionally, Mitigation Measure 6.1c has been added to the EIR to ensure that significant impacts to SNYLF are avoided during project construction. This measure requires an initial visual encounter survey for adult/metamorph SNYLF covering all suitable aquatic habitats within the project site be completed prior to commencement of any construction activities onsite. The measure also requires that the survey be repeated in each subsequent year during which construction would occur in areas where potential non-breeding habitat occurs, except that if surveys are negative in two consecutive years no additional surveys are required until/unless four or more years have elapsed. If any SYNLF are detected in the current year survey, the measure

requires that daily biological monitoring be conducted in the potential non-breeding habitat and that construction equipment be prohibited from entering areas within 100 feet of the habitat on any day when SNYLF are observed further than five feet from surface water. The addition of Mitigation Measure 6.1c would reduce potential impacts to SNYLF to less than significant and would not change the overall conclusions of the EIR with respect to impacts to biological resources.

Subsequent to consultation with the U.S. Fish and Wildlife Service, the project applicant retained a qualified biologist with experience conducting amphibian visual encounter surveys in the Sierra Nevada to complete the initial survey of the project site. The Alpine Sierra Subdivision Sierra Nevada Yellow-legged Frog Surveys Technical Memorandum is provided with this Final EIR as Appendix D3.

Comment Letter B1

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

November 3, 2017

RECEIVED
NOV 0 8 2017
CDRA

Shirlee Herrington
Placer County
3091 County Center Drive
Auburn, CA 95603

Subject: Alpine Sierra Subdivision
SCH#: 2014042028

Dear Shirlee Herrington:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 2, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. B1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2014042028
Project Title Alpine Sierra Subdivision
Lead Agency Placer County

Type EIR Draft EIR

Description Proposes to develop 47 single family residential units and 5 secondary dwelling units on the +/-47.3 acre property. 27 of the lots would be located on the eastern portion of the project site. These lots are proposed to range in size from 0.41 to 1.0 acres, averaging 0.70 acres, and would be established as custom-build sites. Up to five of these lots would be allowed to include separate guest facilities. The 20 lots in the western portion of the project site are proposed to include 14 halfplex sites and 6 custom cabin home sites. The halfplex sites would range from 0.08 to 0.17 acres, and the custom cabin homes sites would range from 0.19 to 0.38 acres.

Lead Agency Contact

Name Shirlee Herrington
Agency Placer County
Phone 530 745 3132 **Fax**
email
Address 3091 County Center Drive
City Auburn **State** CA **Zip** 95603

Project Location

County Placer
City
Region
Lat / Long 39° 10' 13.73" N / 120° 14' 8.92" W
Cross Streets
Parcel No. 095-280-011, -022, -023, 095-450-006
Township 15N **Range** 16E **Section** 5/8 **Base** Tahoe

Proximity to:

Highways SR 89
Airports No
Railways No
Waterways Bear Creek, Five Lakes Creek, Whiskey Creek, Squaw Creek, Truckee River
Schools No
Land Use residential/res single fam, planned development and open space

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Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Biological Resources

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Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 2; Cal Fire; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3 N; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe); Air Resources Board; State Water Resources Control Board, Division of Drinking Water; Native American Heritage Commission; State Lands Commission; Tahoe Regional Planning Agency; California Tahoe Conservancy

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Date Received 09/19/2017 **Start of Review** 09/19/2017 **End of Review** 11/02/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Comment Letter B1

Governor's Office of Planning and Research
Scott Morgan
November 8, 2017

B1-1 The comment states that no state agencies submitted comments to OPR by the end of the comment period. The comment provides contact information in the event of any questions.

No comments regarding the adequacy or accuracy of the EIR or raising environmental concerns were received; thus, no response is required.

Comment Letter C1

TAHOE-TRUCKEE SANITATION AGENCY
A Public Agency
13720 Butterfield Drive
TRUCKEE, CALIFORNIA 96161
(530) 587-2525 • FAX (530) 587-5840

Directors
O.R. Butterfield
Dale Cox
S. Lane Lewis
Jon Northrop
Dan Wilkins
General Manager
LaRue Griffin

VIA E-MAIL

18 October 2017

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

RE: T-TSA Comments on Draft Environmental Impact Report for the Alpine Sierra Subdivision Project

To Whom It May Concern:

The Tahoe-Truckee Sanitation Agency (T-TSA) has received the Draft Environmental Impact Report (DEIR) for the Proposed Alpine Sierra Project (Project). T-TSA staff has reviewed these materials and offers the following comments.

1. At the present time, there is sufficient capacity in T-TSA's Truckee River Interceptor and Water Reclamation Plant to serve the Project. However, please be advised that T-TSA does not issue Will Serve letters. All capacity allocations are made on a first-come, first-serve basis for all projects within T-TSA's service area which includes portions of Nevada County, Placer County, and El Dorado County. C1-1

2. The DEIR makes reference to available capacity of T-TSA's facilities. A statement is made in Section 14 that TTSA "has sufficient capacity to treat wastewater generated by the project." T-TSA would like to clarify that capacity is guaranteed only after the approval of the formal application, payment of T-TSA sewer connection charges, and the issuance of a T-TSA Sewer Connection Permit.

3. The DEIR states that wastewater disposal would be provided by Alpine Springs County Water District (ASCWD). Please also add T-TSA as a special district that will also be providing this service to the development. C1-2

4. A variety of utility and service provides are listed in Section 3.4.5. Please add T-TSA as an additional utility under the "wastewater" category.

Potential impacts to ASCWD's wastewater collection facilities should also be evaluated. Project planners should contact and coordinate with ASCWD separately from T-TSA in evaluating the impacts of this Project to their systems. C1-3

T-TSA would like to thank Placer County for the opportunity to provide these comments. Please evaluate and address the concerns noted above so that we can better define the impacts that this Project might have on T-TSA's facilities and operations. C1-3 Cont.

If you have any questions, please do not hesitate to call me at (530) 587-2525.

Sincerely,

Jason A. Parker
Engineering Manager

c: LaRue Griffin, General Manager
John Collins, Alpine Springs County Water District

Response to Comment Letter C1

Tahoe-Truckee Sanitation Agency
Jason A. Parker
October 18, 2017

C1-1 The comment states although TTSA's Truckee River Interceptor and Water Reclamation Plant currently possess sufficient capacity to serve the project, that TTSA does not issue Will Serve letters and that all capacity allocations for projects within TTSA's service area are made on a first-come, first-serve basis. The comment also notes that Section 14 of the Draft EIR states that TTSA has sufficient capacity to treat wastewater generated by the project. The comment clarifies that TTSA's capacity is only guaranteed after the approval of the formal application, payment of TTSA sewer connection charges, and the issuance of a TTSA Sewer Connection Permit.

Text has been added to Chapter 14, Public Services and Utilities to incorporate the information provided in this comment. The revised text is presented in Chapter 4 of this Final EIR.

C1-2 The comment reiterates that the Draft EIR states that wastewater disposal would be provided by Alpine Springs County Water District (ASCWD). The comment requests that TTSA be added as a special district to provide this service to the development and be identified as a wastewater utility provider in Section 3.4.5 of the Draft EIR.

Text has been added to Chapter 3, Project Description to incorporate the information provided in this comment. The revised text is presented in Chapter 4 of this Final EIR.

C1-3 The commenter recommends that potential impacts of the project to ASCWD's wastewater collection facilities be evaluated and that ASCWD be contacted and coordinated with separately from TTSA to assist this analysis.

The Draft EIR was circulated to ASCWD, which did not submit any comments. This indicates that the ASCWD concurs with the Draft EIR description of ASCWD facilities and analysis of the project's potential to adversely affect those facilities. Moreover the Placer County staff and the project applicant have been coordinating directly with the ASCWD on this project and the conditions under which it can be served.

Comment Letter C2

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Manager
Brad Brewer, Development Coordinator

November 6, 2017

Shirlee Herrington
Placer County
Planning Services Division
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

RE: Alpine Sierra (PSUB20130004), Draft EIR

Shirlee:

Please have the applicant address the following comments which were not addressed per the District's previous letter dated May 16, 2017 regarding the Screencheck Draft Environmental Impact Report (DEIR). These including revising the DEIR, Section 12.1.5 entitled Floodplains to include a discussion of the FEMA preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRM) dated December 28, 2015 as indicated would be added per the email we received from Brad Shirhall dated September 29, 2016. We also recommend that an additional reference to the new preliminary FIRM panel number 0602390340 H dated December 28, 2015 be added which has changed from the current effective 1998 FIRM panels referenced. C2-1

Please call me at (530) 745-7541 if you have any questions regarding these comments.

Brad Brewer, M.S., P.E., CFM, QSD/P
Development Coordinator

t:\dpw\fcd\development review\letters\planning\cn17-135 alpine sierra deir.docx

Response to Comment Letter C2

Placer County Flood Control and Water Conservation District
Brad Brewer, M.S., P.E., CFM, QSD/P, Development Coordinator
November 6, 2017

C2-1 The commenter requests that Section 12.1.5, Floodplains, of the Draft EIR be revised to reference the FEMA preliminary Flood Insurance Study and Flood Insurance Rate Maps (FIRM) dated December 28, 2015, which becomes effective November 2018. The commenter also recommends that an additional reference to the new preliminary FIRM panel number 0602390340 H dated December 28, 2015 be added to the Draft EIR instead of the 1998 FIRM panels.

Section 12.1.5 of the EIR has been revised to reference the updated Flood Insurance Study and FIRM. The revised text is provided in Chapter 4 of this Final EIR. The comment does not raise issues pertaining to the adequacy of the EIR and therefore no further response is required.

Comment Letter D1

MIWOK MAIDU United Auburn Indian Community of the Auburn Rancheria

Gene Whitehouse, Chairman | John L. Williams, Vice Chairman | Calvin Moman, Secretary | Jason Camp, Treasurer | Gabe Cayton, Council Member

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OCT 25 2017
CDRA

October 17, 2017

Alex Fisch
Project Planner
County of Placer
110 Maple Street
Auburn CA 95603

RE: AB 52 Consultation Request for the Proposed Alpine Sierra Subdivision (PSUB 20130004) Project, Bear Creek Valley, CA

Dear Project Planner Alex Fisch,

The United Auburn Indian Community (UAIC) received a letter from the County of Placer dated 9/25/2017, formally notifying us of a proposed project, the Alpine Sierra Subdivision (PSUB 20130004) Project in Bear Creek Valley, and an opportunity to consult under AB 52. This letter is notice that UAIC would like to initiate consultation under AB 52.

We would like to discuss the topics listed in Cal. Public Resources Code section 21080.3.2(a), including the type of environmental review to be conducted for the project; project alternatives; the project's significant effects; and mitigation measures for any direct, indirect, or cumulative impacts the project may cause to tribal cultural resources. As consultation progresses, we may also wish to discuss design options that would avoid impacts to tribal cultural resources; the scope of any environmental document that is prepared for the project; pre-project surveys; and tribal cultural resource identification, significance evaluations and culturally-appropriate treatment.

This letter is also a formal request to allow UAIC tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the project. Please send us all existing cultural resource assessments, as well as requests for, and the results of, any records searches that may have been conducted prior to our first consultation meeting. If tribal cultural resources are identified within the project area, it is UAIC's policy that tribal monitors must be present for all ground disturbing activities. Finally, please be advised that UAIC's strong preference is to preserve tribal cultural resources in place and avoid them whenever possible. Subsurface testing and data recovery must not occur without first consulting with UAIC and receiving UAIC's written consent.

D1-1

In the letter, Project Planner Alex Fisch is identified as the lead contact person for consultation on the proposed project. Marcos Guerrero, our Cultural Resources Manager, will be UAIC's point of contact for this consultation. Please contact Mr. Guerrero by phone at (530) 883-2364 or email at mguerrero@auburnrancheria.com to begin the consultation process.

Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380

Thank you for involving UAIC in the planning process at an early stage. We ask that you make this letter a part of the project record and we look forward to working with you to ensure that tribal cultural resources are protected.

D1-1 Cont.

Sincerely,

Gene Whitehouse,
Chairman

CC: Matthew Moore, UAIC Tribal Historic Preservation Officer
Marcos Guerrero, UAIC Cultural Resources Manager

Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380

Response to Comment Letter D1

United Auburn Indian Community
Gene Whitehouse, Chairman
October 17, 2017

D1-1 The comment states that the United Auburn Indian Community (UAIC) received a letter from the County of Placer dated 9/25/2017 that formally notified the UAIC of the proposed project and of the opportunity to consult under AB 52, that the submitted letter is notice that UAIC would like to initiate consultation with Placer County under AB 52, and lists several topics that UAIC would like to discuss. The comment also presents a formal request to allow UAIC tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the project. The comment requests to be sent all existing cultural resource assessments, as well as requests for, and the results of, any records searches that may have been conducted prior to the first consultation meeting. The comment states that it is UAIC's policy that tribal monitors be present for all ground disturbing activities, it is UAIC's strong preference to preserve tribal cultural resource in place and avoid them whenever possible, that subsurface testing and data recovery should not occur without first consulting with UAIC and receiving UAIC's written consent.

The Notice of Preparation for this EIR was published on April 8, 2014, which predates the adoption of AB 52 in September 2014. Further, as provided in section 11(c) of AB 52, the notification and consultation requirements established by AB 52 "apply only to a project that has a notice of preparation or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015." Thus the notification and consultation requirements of AB 52 are not applicable to the proposed Alpine Sierra Subdivision project. The letter that UAIC received from the County in September 2017 was a notification of the availability of the Draft EIR for review rather than a project notification under AB 52.

As discussed on pages 13 through 15 of the Initial Study, there are no known cultural or historic resources within the project site. This was determined through a comprehensive literature review and archaeological reconnaissance of the project site conducted by a qualified archeologist who concluded that no further pre-construction considerations were warranted. Based on this analysis, the Draft EIR does not include any additional consideration of potential impacts to cultural resources.

Comment Letter E1

TRUCKEE RIVER WATERSHED COUNCIL

PO Box 8568
Truckee, CA 96162
530-550-8760
www.truckeeriverwc.org

October 25, 2015

Alex Fisch
Project Manager
Placer County Planning Services
3091 County Center Drive Auburn, CA 95603

Dear Alex,

Thank you for the opportunity to comment on the proposed project: Alpine Sierra Subdivision.

This project proposes new development within the community of Alpine Meadows on a 47-acre parcel.

The mission of the Watershed Council is to bring the community *Together for the Truckee* to protect, enhance and restore the Truckee River watershed. We have worked in partnership with Placer County for over the past 20 years to improve the health of the watershed, and look forward to this ongoing relationship.

Based on our mission, we reviewed the proposed plans for the Alpine Sierra Subdivision with interest and offer the following comments: E1-1

Project Alternatives – The Watershed Council prefers Alternative D, which provides increased protection and avoidance of environmentally sensitive areas including riparian and floodplain habitat. Alternative D would eliminate two of three stream crossings along the unnamed tributary within the eastern portion of the project site.

This alternative also increases the amount of total open space within the proposed project site to a total of 7.39 acres. The reduced footprint will reduce impervious surface areas, allowing for a greater ability of the landscape to infiltrate stormwater runoff, and provide buffer zones to known environmentally sensitive areas. E1-2

Biologic Resources – The project area consists of areas that are of significant importance to environmental functionality including riparian habitat, forested areas, and both ephemeral and perennial waterways. The Watershed Council encourages protection and preservation of these resources to the maximum extent possible during and after construction of the Alpine Sierra Subdivision. E1-3

Geology/Soils – The proposed development site is currently vacant, supports natural topsoil, and consists of moderate to steep topography. Substantial grading and changes in local topography will be incorporated throughout the project site during the construction of new roadways and new residential properties. The Watershed Council E1-4

urges both temporary and permanent erosion control methods be implemented to the highest standards. E1-4 Cont.

Hydrology - The primary receiving waterbody of flows discharged from the project site is the Truckee River, included on the 303d list as impaired for sedimentation by the Environmental Protection Agency *(EPA)* and the Lahontan Regional Water Quality Control Board. The proposed development will significantly increase the amount of impervious surface areas within the project site, which will mean a higher likelihood of increased stormwater velocities, potential for erosion, and decreased infiltration within the project site. The Watershed Council recommends that both temporary and permanent Best Management Practices (BMPs) be implemented to treat all impervious surface areas to conform and comply with full extent of Placer County's and the State Water Board National Pollutant Discharge Elimination System stormwater regulation. E1-5

Best Management Practices - The Watershed Council views the description of BMPs to be implemented and maintained throughout the project site during and post construction to be adequate. The primary consideration will be to ensure that any disturbed areas are not left untreated or exposed through extended periods of storm events or through the winter months. E1-6

It is important to note that because the majority of the project site occurs within a north-facing slope it may be more difficult to establish vegetation as a permanent erosion control method. Project proponents should be prepared to implement alternative treatments in the event that vegetation does not become adequately established. E1-7

The comments noted above and the recommended actions are representative of information provided in the DEIR, but are no means an exhaustive list of the mitigation measures that will need to be implemented to ensure minimal impact to the environment.

The Watershed Council's goal is to complete 50 high priority projects in the next 10 years in order to improve the health and function of the Truckee River watershed. We encourage implementation of additional Low Impact Development (LID) actions that will reduce negative impacts on local waterways and improve habitat and water quality considerations throughout the project site. E1-8

Sincerely,

Lisa Wallace
Executive Director

Eben Swain
Program Manager

Response to Comment Letter E1

Truckee River Watershed Council
Lisa Wallace, Executive Director and Eben Swain, Program Manager
October 25, 2015

E1-1 The comment identifies the mission of the Truckee River Watershed Council (Watershed Council) as working to protect, enhance and restore the Truckee River watershed.

The comment provides introductory remarks and does not address the content of the Draft EIR of the environmental effects of the project. No response is necessary.

E1-2 The comment identifies the Watershed Council's preference for Alternative D because it would provide greater avoidance of environmentally sensitive areas and provide buffer zones to these areas, eliminate two of four stream crossings along the unnamed tributary within the eastern portion of the project site, increase the amount of open space within the project site and reduce impervious surface areas.

Draft EIR Section 16.7.3.3 provides a description of Alternative D, which is consistent with the summary of this alternative provided in the comment. The biological resource impacts of Alternative D are compared to Alternative A on Draft EIR page 16-28. This discussion concludes that potential impacts to biological resources would be reduced under Alternative D but this alternative would require implementation of mitigation measures identified for the proposed project, including conducting pre-construction surveys for active nests and roosts, use of avoidance measures to reduce impacts to wetlands and riparian habitat, and compensatory measures to address any riparian habitat impacts that cannot be avoided. Draft EIR Section 16.7.7 identifies Alternative D as the environmentally superior alternative but also notes that the EIR demonstrates that neither Alternative A nor Alternative B would result in any significant and unavoidable impacts to biological resources.

E1-3 The comment states that the project area consists of areas that are of significant importance to environmental functionality including riparian habitat, forested areas, and ephemeral and perennial waterways. The comment states that the Watershed Council encourages protection and preservation of these resources to the maximum extent possible during and after construction of the proposed project.

The Draft EIR identifies the habitat types present on the project site on pages 6-3 through 6-5, and provides a habitat map in Figure 6-1. The impacts to these habitats are evaluated in Impacts 6.1 and 6.2. As discussed on page 6-19, the project would

avoid impacts to riparian habitat onsite other than where bridges are needed to cross Bear Creek and the seasonal stream that crosses the northeast part of the site. Where these crossings occur any impacts to riparian habitat would be reduced to a less than significant level with implementation of Mitigation Measures 6.2a through 6.2c. These measures require avoiding or minimizing construction impacts in areas of riparian habitat and restoration or compensatory mitigation where avoidance is infeasible. To prevent adverse effects to riparian habitat after project construction, the project would comply with the Placer County Zoning Code requirements to provide a minimum setback of 50 feet from the centerline of seasonal streams and 100 feet from the centerline of any perennial watercourse.

Forest habitat occurs throughout the site. On page 6-3, the Draft EIR notes that "Although there are numerous vigorous and healthy trees present throughout the site, the overall health of the forest on this parcel is in a state of decline. The increased pressure for limited resources is causing stress and making the trees susceptible to a greater risk of the spread of insect and disease." As discussed in Master Response 2, implementation of the Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2) would require removal of all vegetation within 5 feet of any structure (the Fire Free Zone), while vegetation thinning would be required at further distances from the structures. Under both alternatives, the Structural Protection Zone extends 30 feet beyond each building. It encompasses the Fire Free Zone and would cover 24 acres of the site. In this zone, vegetation thinning would be required to limit the vertical and horizontal connectivity of trees. Vegetation removal in the Wildland Fuel Reduction Zone and the Defensible Space Zone, which cover the remainder of the site, would be more limited. Thus the forest habitat in those areas would remain, although it would be altered and would generally have decreased value for wildlife. In Impact 6.7, the Draft EIR recognizes that Alternative A would result in removal of approximately 33 acres of forest habitat while Alternative B would result in removal of approximately 28 acres. The loss of forest habitat is considered to be a less than significant impact due to the widespread presence of this habitat type in the project region.

E1-4 The comment notes that the project site is vacant and supports natural topsoil, and that the site's moderate to steep topography necessitates substantial grading and changes in local topography. The comment states that the Watershed Council urges both temporary and permanent erosion control methods be implemented to the highest standards.

Please refer to Master Response 7, Hydrology and Water Quality, which discusses the water quality management measures that would be used onsite. This includes temporary and permanent erosion control methods that would be identified in the

Stormwater Pollution Prevention Plan required for the project. In addition, Mitigation Measures 11.2a through 11.2d and 11.4c identify several mechanisms by which the County can ensure that appropriate erosion control is implemented, including requiring preparation of an erosion control plan and improvement plans, defining a maximum allowed slope for graded areas, requiring revegetation of graded areas, and requiring the project applicant to submit a letter of credit or cash deposit in the amount of 110% of an approved engineer's estimate for winterization and permanent erosion control work.

E1-5 The comment states that the Truckee River is the primary waterbody that receives stormwater discharges from the project site and that the river is designated as impaired for sedimentation. The comment states that the project would "significantly increase the amount of impervious surface areas within the project site, which will mean a higher likelihood of increased stormwater velocities, potential for erosion, and decreased infiltration within the project site. The Watershed Council recommends that both temporary and permanent Best Management Practices (BMPs) be implemented to treat all impervious surface areas to conform and comply with full extent of Placer County's and the State Water Board National Pollutant Discharge Elimination System stormwater regulation."

Please refer to Master Response 7 regarding the conclusions of the project's Preliminary Drainage Analysis and the BMPs that would be implemented onsite to ensure compliance with the California Stormwater Quality Association's *Stormwater Best Management Practice Handbooks for New Development and Redevelopment* and the County's *Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection*.

E1-6 The comment states that the Watershed Council views the description of BMPs to be implemented and maintained throughout the project site during and post construction to be adequate. The primary consideration will be to ensure that any disturbed areas are not left untreated or exposed through extended periods of storm events or through the winter months.

Please refer to Master Response 7 for additional discussion of the BMPs that would be implemented onsite. Further, Mitigation Measure 11.4c requires preparation of an erosion control plan that includes details of the proposed methods for winterizing the site to protect against erosion.

E1-7 The comment states that because the majority of the site consists of north-facing slopes, it may be difficult to establish vegetation as a permanent erosion control method and

that alternative treatments may need to be implemented if vegetation does not become adequately established.

Please refer to Master Response 7 regarding implementation of the proposed BMPs and the funding required to be provided under Mitigation Measure 11.2a that would provide the County with the ability to ensure that any modifications or repair to erosion control improvements will be made if necessary to improve the effectiveness of those measures.

E1-8 The comment provides conclusory remarks regarding the need for mitigation at the project site and the Watershed Council's goals for environmental restoration in the project region. The comment recommends that additional Low Impact Development measures be implemented at the site to further reduce water quality impacts.

Please refer to Master Response 7 regarding implementation of BMPs and Low Impact Development measures at the project site.

Comment Letter E2

FRIENDS OF THE WEST SHORE
• Protecting Our Watersheds • Wildlife • Rural Quality of Life

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

October 25, 2017

Subject: Draft Environmental Impact Report (DEIR) for Alpine Sierra Subdivision

Dear Mr. Fisch:

The Friends of the West Shore appreciates this opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Alpine Sierra Subdivision.

The Friends of the West Shore (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. We are concerned with the extent of proposed development along the West Shore, North Shore, and areas bordering the Lake Tahoe Basin (such as Alpine Meadows), and the cumulative impacts of these multiple projects on our communities and environment, which include increased Vehicle Miles Traveled (VMT) in the Basin, increased water and air pollution, noise, and other adverse impacts associated with increasing visitor and resident populations, both in the Basin and surrounding areas. The attached comments are provided to assist with development of the Final EIR for the proposed project. In summary:

- The DEIR fails to analyze the proposed project's impacts to Lake Tahoe Basin associated with additional vehicle use within the Basin;
- The assumptions in the DEIR's traffic analysis are not supported and must be revised to accurately analyze and disclose potential project impacts;
- The DEIR underestimates the potential traffic impacts to State Route 89, resulting in a failure to consider the project's potential impacts to the main emergency access route for west and north shore communities; and
- The DEIR fails to include the cumulative impacts from approved plans and projects in the region.

E2-1

We hope these comments will assist Placer County with the development of a comprehensive, technically-adequate Final EIR that includes adequate mitigation for the proposed project's impacts to the Lake Tahoe Basin and public health and safety. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President

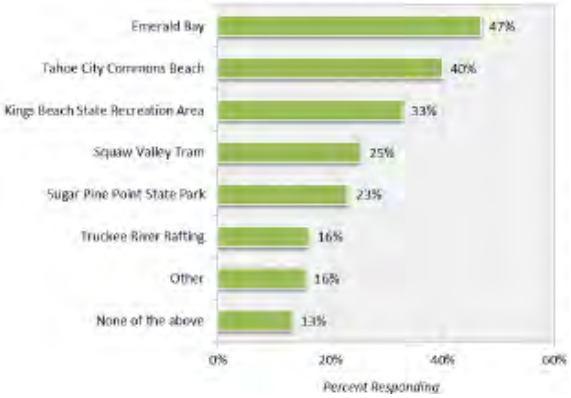
Jennifer Quashnick,
Conservation Consultant

A. Traffic impacts to the Lake Tahoe Basin:

In our NOP comments, we requested the project's traffic impacts on the Lake Tahoe Basin be analyzed.[1] However, the DEIR fails to address the project's impacts to the Lake Tahoe Basin. Further, as noted in the sections below, the project's total traffic (a portion of which will impact Lake Tahoe) has been underestimated.

Whether new occupants are full time residents, part-time residents, or visitors, they will make vehicle trips into the Tahoe Basin at some point. Further, given the popularity of vacation rentals, it is reasonable to expect the project to bring a variety of visitors to the area (versus just being used by the same owners on weekends, for example). New visitors are more likely to drive to see Lake Tahoe (and popular areas like Emerald Bay) during their trip. The impacts of these trips into the Lake Tahoe Basin have not been analyzed.

Figure 7: Visited Attractions on Trip



As illustrated in Figure 7 above from North Lake Tahoe Resort Association visitor Research,[2] a recent survey of visitors throughout the Tahoe/Truckee/Squaw Valley Region[3] found that "*The most popular attraction was Emerald Bay, with 47 percent of survey respondents indicating spending time during their visit there*." (p. 6). As the survey shows, more visits were made to locations *within the Tahoe Basin* than elsewhere. E2-2

In order to assess the traffic, air, water, noise, scenic, and recreational impacts of the Proposed Project on the Tahoe Basin, the FEIR needs to include information regarding vehicle trips and VMT generated within the Lake Tahoe Basin associated with maximum visitor use of the homes.

[1] 5/8/2014 FOWS comments: "The NOP only notes traffic studies will be completed for intersections outside of the Lake Tahoe Basin (p. 19-20), however, new residents and visitors to Alpine Meadows are likely to drive into the Basin at some point (or regularly), affecting intersections in Tahoe City and south on S.R. 89 along the West Shore. Lake Tahoe Basin VMT, congestion, air pollution, water pollution, noise, and other cumulative impacts must be adequately analyzed in the EIR." (p. 2)

[2] http://nltra.org/documents/pdfs/RRC%20Summary%20NLTRA%20Summer%202014.pdf

[3] "Location of lodging. Overnight visitors were staying in a variety of locations, primarily in Northstar (29 percent of overnight visitors staying there), Squaw Valley (21 percent), and Tahoe City (15 percent). Other locations of lodging were Tahoe Vista (7 percent), Kings Beach (7 percent), West Shore (6 percent), and Truckee (5 percent)." NLTRA Visitor Research, 2014 (p. 2).

B. Overall traffic analysis:

1. Trip generation by land use type:

The DEIR underestimates potential daily trip generation by relying on a "Recreation home" land use to calculate trips for approximately half of the new units, which the DEIR recognizes as having "relatively low" traffic generation rates.[4] As noted on p. 8, the trip generation rate for a single family home is 2.5 times the rate for a recreation home (0.75 versus 0.30, resp.).[5] In fact, trip generation rates for recreation homes are the lowest among all other uses in the table.

Unless Placer County will limit the use of the new homes such that 75% can only be used for recreation (to match the DEIR's assumption[6]), the FEIR must analyze the impacts from the potential maximum use of the new units by using the highest trip generation rate that may apply (to all new single family primary residences, vacation homes, and duplex units). In this case, the FEIR needs to analyze impacts that could occur if the single family residential rate is applied to all such new units.

E2-3

2. Trip generation during peak periods of visitation:

The DEIR does not address the maximum capacity of the project during peak visitation periods (e.g. weekends and Holidays). For example:

- The ITE rates are not stated to be for such peak periods, nor do they address the size, and therefore capacity, of units.
- The significant traffic problems now experienced in the region on most winter and summer weekends and Holidays are not in question.
- The popularity of vacation rentals (through services such as VRBO), and the tendency to pack large groups of people into such rentals, are also well understood.

E2-4

Therefore, unless restrictions are placed on the home's use and/or maximum occupancy, there is the potential for the new units to be rented to a significant number of visitors during these already-congested periods, thereby worsening traffic problems during peak periods. However, the DEIR does not address this impact. We herein incorporate the comments submitted by Sierra Watch on the Village at Squaw Valley Specific Plan regarding peak occupancy rates of homes in the area as they also apply to this DEIR analysis.[7]

Unless Placer County will prohibit the new homes from being used as vacation rentals and/or place limits on maximum per-unit capacity, the FEIR must also analyze the

[4] "...the relatively low "Recreational Homes" trip generation rates…" (App. E, p. 7)
[5] TABLE 1: Alpine Sierra Subdivision Trip Generation
[6] "Therefore, about 75 percent of the proposed detached units on the project site are assumed to be vacation homes (recreation homes)." (App. E, p. 7)
[7] 7/16/2015 Sierra Watch comments on Village at Squaw Valley Specific Plan draft EIR, submitted by Shute, Mihaly, and Weinberger, LLP.

potential impacts of visitor use during peak periods to ensure full disclosure of potential environmental impacts and provide adequate mitigation.

In order to ensure adequate environmental analysis as required by CEQA, the FEIR needs to analyze the potential traffic impacts associated with the maximum capacity of the project during peak periods (e.g. weekends, Holidays).

E2-4 Cont.

3. Number of bedrooms versus units:

The DEIR also bases future cumulative traffic estimates on a simplistic assumption that traffic generated by each new unit will be the same as traffic generated by each existing unit.[8] This fails to consider the size of the new units and how many bedrooms are included (which affects how many people may be vacationing in each unit and therefore driving on affected roadways).

The FEIR must present such details to support this assumption, otherwise the analysis must be revised to reflect the number of trips associated with the size of units (for example, trips per bedroom would be more appropriate than per housing unit).

E2-5

4. Cumulative impacts:

The DEIR relies on a 2012 Caltrans report and general growth rate from that document to analyze the cumulative impacts to State Route 89.[9] However, this does not appear to incorporate the cumulative traffic impacts associated with the Village at Squaw Valley Specific Plan (VSVSP),[10] Tahoe Basin Area Plan (TBAP),[11] the proposed Alpine Meadows to Squaw Valley Gondola[12] (which may increase traffic in the study area in the short- and long-term due to construction and increased resort visitation), proposed White Wolf Subdivision,[13] and other approved plans and projects that will increase traffic on Alpine Meadows Road, SR 89, and in the Tahoe Basin. In addition, the DEIR relies on the 2014 base year for its analysis.[14] However, traffic in the region substantially increased

E2-6

[8] "…the projected increase in housing units is used as the basis for estimating future traffic volumes along Alpine Meadows Road." (App. E, p. 13)

[9] "Future cumulative (20-year horizon) traffic volume projections for SR 89 in the study area are provided in the *SR 89 Transportation Corridor Concept Report* (Caltrans, 2012). Based on a comparison of the 2010 and 2030 traffic volumes provided in that report, the average growth rate is estimated to be approximately 0.92 percent per year. This rate is applied to the existing peak-hour volumes on SR 89 in order to estimate the future cumulative volumes." (App. E, p. 13)

[10] VSVSP DEIR, Chapter 18, Other CEQA Sections: http://www.placer.ca.gov/~/media/cdr/ecs/eir/vsvsp/deir/18_vsvsp_deir_otherceqa.pdf?la=en

[11] TBAP and Tahoe City Lodge DEIR/S, Chapter 19, Cumulative Impacts: http://www.trpa.org/wp-content/uploads/19_Cumulative.pdf

[12] https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/squawvalleygondolaproject

[13] Project proposes: "38 single-family residential lots (.5-acre to 1.5-acre in size); 10,360 sf clubhouse/lodge, ski resort facilities, warming hut, and ski lift on approximately 74 acres of a 460-acre property owned by applicant." October 2017 Placer County Active Projects List, p. 21. http://www.placer.ca.gov/~/media/cdr/ecs/currentprojects/2017/1017%20october%20ceqa_alpha.pdf?la=en

[14] App. E, p. 4

from 2015 to 2017;[15] this increase must be accounted for in the cumulative impacts analysis.

E2-6 Cont.

The FEIR needs to incorporate the traffic impacts from other projects and plans in the region into the cumulative impacts analysis.

[15] E.g. http://www.sacbee.com/news/local/transportation/article149574509.html; http://tahoequarterly.com/best-of-tahoe-2017/seeking-traffic-solutions-tahoe

Response to Comment Letter E2

Friends of the West Shore
Susan Gearhart, President and Jennifer Quashnick, Conservation Consultant
October 25, 2017

E2-1 The comment describes the purpose and goals of the Friends of the West Shore and summarizes the key points of the subsequent comments.

This comment provides introductory remarks and does not address the content of the Draft EIR or provide specific comments regarding the project's environmental impacts. No response is required.

E2-2 The comment states that Friends of the West Shore provided comments in response to the Notice of Preparation for this project, requesting that the Draft EIR analyze the project's traffic impact on the Lake Tahoe Basin, but that the Draft EIR failed to analyze these impacts. The comment requests that the Final EIR include information regarding vehicle trips and the project's likely contribution to vehicle miles traveled within the Lake Tahoe Basin.

Please refer to Master Response 4, Traffic, which includes an analysis of the project's potential contribution to vehicle miles traveled within the Lake Tahoe Basin.

E2-3 The comment states that Draft EIR underestimates the potential daily trip generation by relying on the recreation home land use. The commenter states that unless the County will limit the new homes such that only 75% can be used as recreation homes, the Final EIR must analyze the impact from the potential maximum use of the new units by using the highest trip generation rate that may apply.

Please refer to Master Response 4, Traffic, which elaborates on the data that supports the assumption that 75% of the single-family units within the project site would be used as recreation homes.

E2-4 The comment states that the Draft EIR does not address the maximum capacity of the project during peak visitation periods and thus there is the potential for the new units to be rented to a significant number of visitors during these already-congested periods, thereby worsening traffic problems during peak periods. The comment incorporates the comments submitted by Sierra Watch on the Village at Squaw Valley Specific Plan Draft EIR regarding peak occupancy rates of homes in the area, noting that these comments also apply to the Alpine Sierra Subdivision EIR. The comment states that the Final EIR needs to analyze the potential traffic impacts associated with the maximum capacity of the project during peak periods.

Please refer to Master Response 4, Traffic, which elaborates on the trip generation assumptions used in the Traffic Impact Analysis and discusses why the Traffic Impact Analysis considers the 30th highest peak hour traffic conditions rather than maximum peak traffic conditions. It should be further noted that there are substantial differences between the Alpine Sierra subdivision project, which consists of up to a maximum of 47 single-family residential homes consisting of a mixture of private residences and vacation homes only. By contrast the Village at Squaw Valley Specific Plan project consists of a ski resort hospitality project that includes up to 850 units consisting primarily of hotel-condominium units, plus 297,733 square feet of new commercial uses such as retail shopping, restaurants and commercial recreation land uses. Accordingly, the two projects are not directly comparative in either their development characteristics or operational characteristics including traffic generation rates.

E2-5 The comment states that the Draft EIR bases future cumulative traffic estimates on the assumption that traffic generated by each new unit will match the traffic generation rates of existing units in Alpine Meadows and that the Traffic Impact Analysis does not consider the size of the proposed dwelling units, and the number of bedrooms, which would affect the number of vacationers. The comment references text in the Traffic Impact Analysis (Draft EIR Appendix E1) that states "the projected increase in housing units is used as the basis for estimating future traffic volumes along Alpine Meadows Road."

Please refer to Master Response 4, Traffic, which elaborates on the assumptions used in evaluating the project's contribution to cumulative traffic impacts and the trip generation data on which the analysis is based. Text that is similar to the text quoted in the footnote to this comment also appears on page 15-10 of the Draft EIR. The text referenced in this comment does not indicate that traffic generated by the proposed units would be the same as the traffic generated by existing dwelling units in Alpine Meadows. Rather, it identifies the assumptions regarding the amount of additional development assumed in the project vicinity that would contribute to the cumulative traffic volumes.

E2-6 The comment states that the Draft EIR relies on a 2012 Caltrans report and general growth rate from that document to analyze the cumulative impacts to State Route 89 but that it does not appear to incorporate the cumulative traffic impacts associated with the Village at Squaw Valley Specific Plan, Tahoe Basin Area Plan, the proposed Alpine Meadows to Squaw Valley Gondola, proposed White Wolf Subdivision, and other approved plans and projects that will increase traffic on Alpine Meadows Road, SR 89, and in the Tahoe Basin. The comment also states that the Draft EIR relies on the 2014 base year for its analysis but that traffic in the region substantially increased

from 2015 to 2017 and that this increase must be accounted for in the cumulative impacts analysis.

Please refer to Master Response 4, Traffic, which discusses the use of growth rates to inform the cumulative traffic impacts analysis in the Draft EIR and compares the Draft EIR cumulative traffic impacts analysis to the cumulative scenario assumptions and impacts analysis in the Village at Squaw Valley Specific Plan EIR.

Comment Letter E3

Placer County Community Development Resource Agency
c/o Alex Fisch
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cdraecs@placer.ca.gov
sent via electronic mail

Re: Comments on Draft Environmental Impact Report for the Alpine Sierra Subdivision

The Aqua Terra Aeris Law Group, on behalf of our client, Bear Creek Association, submits the following comments and questions to the Placer County Community Development Resource Agency regarding the *Draft Environmental Impact Report* ("DEIR") for the Alpine Sierra Subdivision ("Project"). Members of the public have commented with deep and justified concerns about the impacts of the Project and the inadequacy of the environmental documents prepared thus far.

A. <u>CEQA Overview</u>

CEQA has two purposes: environmental protection and informed self-government. (*Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 690-691.) First, CEQA "[e]nsure[s] that the long-term protection of the environment . . . shall be the guiding criterion in public decisions." (Pub. Resources Code, § 21001, subd. (d); see also *No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 74.) CEQA requires agencies to "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state." (Pub. Resources Code, § 21001, subd. (a).) Agencies should not approve projects "if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects . . . ." (*Id.*, § 21002.) "[T]he public agency bears the burden of affirmatively demonstrating that, notwithstanding a project's impact on the environment, the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.) CEQA is "to be interpreted 'to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.'" (*Id.* at 112; see also *Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the U. of Cal.* (1988) 47 Cal.3d 376, 390 (hereafter *Laurel Heights I*); *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259.) E3-1

In turn, the Guidelines for the Implementation of CEQA state that "[p]ublic participation is an essential part of the CEQA process." (Cal. Code Regs., tit. 14, § 15201 (hereafter Guidelines);

see also Guidelines, § 15002, subd. (j); *Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Assn.* (1986) 42 Cal.3d 929, 935-936.) "[P]ublic review provides the dual purpose of bolstering the public's confidence in the agency's decision and providing the agency with information from a variety of experts and sources." (*Schoen v. Cal. Dept. of Forestry and Fire Protection* (1997) 58 Cal.App.4th 556, 574.) In this way, "[t]he EIR process protects not only the environment but also informed self government." (*Laurel Heights I, supra,* 47 Cal.3d at 392.) "'An environmental impact report is an informational document,' the purpose of which 'is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment . . . .'" (*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1106, quoting Pub. Resources Code, § 21061.) "'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.'" (*Id.*, quoting Pub. Resources Code, § 21002.1, subd. (a); see also Guidelines, §§ 15126.2, 15126.6, 15130 [same].) Accordingly, "[a]n EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Laurel Heights I*, *supra*, 47 Cal.3d at 405; see also Guidelines, § 15151.) The lead agency "must use its best efforts to find out and disclose all it reasonably can" in its Draft EIR. (Guidelines, § 15144; see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428.)

For each of the reasons discussed, below, the DEIR falls short of CEQA's informational and substantive requirements, and should be revised and recirculated. In the alternative, the proposed project should be denied.

E3-1 Cont.

B. <u>The DEIR Fails to Adequately Assess Cumulative Impacts.</u>

The DEIR presents an inadequate analysis of cumulative impacts. The DEIR recognizes that a DEIR can evaluate cumulative impacts using "a list of past, present, and probable future projects (including those projects outside of the control of the lead agency)." (DEIR at 15-1.) However, this list does not incorporate the Tahoe Basin Area Plan or the White Wolf Subdivision, among other proposed and approved plans and projects that will have similar impacts on the area. (See *id.* at 15-3–4.)

E3-2

Although an EIR "need not discuss [a] future action "that is merely contemplated or a gleam in a planner's eye," it must analyze "'probable future projects.'" (City of Maywood v. L.A. Unified Sch. Dist. (2012) 208 Cal. App. 4th 362, 397, quoting *Laurel Height Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 398; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1127.) The Tahoe Basin Area Plan was adopted by the Placer County Board of Supervisors on December 6, 2016 and by the Tahoe Regional Planning Agency Governing Board on January 25, 2017. The White Wolf Subdivision certainly meets the "probable future project" standard. In January 2016, the Placer County Planning Commission identified the White Wolf

E3-3

Subdivision as a "proposed project" requiring the preparation of an EIR, "an amendment to the Alpine Meadows General Plan, a Rezone, Major Subdivision, and Conditional Use Permit."[1] As the project is at a stage beyond "a gleam in a planner's eye," the DEIR should have included it in the cumulative impacts section. E3-3 Cont.

These projects will contribute to cumulative impacts in the area, particularly traffic. White Wolf Subdivision is proposed directly across Alpine Meadows Road from the Project site. It is a 38-lot, 44-acre subdivision with a proposed 155 parking spaces. All of the traffic from White Wolf must come onto Alpine Meadows. Therefore, the White Wolf proposed project will contribute to the cumulatively considerable traffic impacts resulting from the Project and other current and probably future projects and plans. The associated cumulative traffic impacts will also logically alter the cumulative air quality and emergency response/evacuation safety effects of the project. Additional cumulative impacts, such as increasing losses in habitat, and increasing sediment loads to Bear Creek, are also foreseeable and should be considered. As such, the agency should revise and recirculate the DEIR with the addition of this analysis. E3-4 E3-5

C. <u>The DEIR Fails to Adequately Assess Traffic Impacts.</u>

The DEIR's traffic analysis is inadequate and fails to consider a number of factors. For instance, as described above, the traffic analysis does not consider traffic from the proposed White Wolf subdivision. (See DEIR Ch. 7.) E3-6

Another issue is that the traffic model the DEIR relies upon one-day traffic surveys from 2011 and last modeled the Level of Service ("LOS") in 2014. Written and oral comments to the County have indicated these data points and modeling methods do not represent actual conditions in summer or in winter, and therefore present an inaccurate baseline condition. The County itself has admitted, at the Planning Commission meeting on October 26, 2017, that the traffic study is inadequate and should be redone. We urge the County to redo the traffic study with current information and a more representative survey, then revise and recirculate the DEIR.

Further, the study and DEIR fail to incorporate increased traffic from trips between the Subdivision and other destinations within the Tahoe Basin, such as Emerald Bay, and other population destinations for visitors and for residents. The DEIR fails to include an analysis of vehicle trips and vehicle miles traveled within this broader Tahoe Basin that would be the existing traffic conditions affected by increased traffic from the proposed Project. E3-7

Another shortcoming is the land use categorization of the Project as "recreation home." The trip generation rate for "recreation home" land use types is 2.5 times lower than the trip generation rate for a single-family home. This categorization, without an assurance that Placer County will limit the use of the new homes to mostly recreational home use, misconstrues the

[1] https://www.placer.ca.gov/~/media/cdr/planning/pc/2016/feb11/tahoeprojectsupdate.pdf?la=en.

Project's true impacts and violates CEQA. At the same time, it is foreseeable that a recreation home could generate more visitors and attendant trips to and from the location, both from out of town, as well as throughout Tahoe Basin's recreational destinations. Similarly, the DEIR fails to address maximum capacity of the units, and the resulting traffic increases, for peak visitation periods during the year. Again, these omissions skew the DEIR's conclusions. E3-7 Cont.

The increased traffic from the Project also threatens emergency access. We are concerned about the DEIR's shelter in place proposals and potential that traffic from the Project will impede evacuations in the case of a fire or other emergency, or prevent emergency personnel from reaching the emergency. From experience, residents in the area have experienced as recently as this past winter bumper-to-bumper traffic on Alpine Meadows Road from Alpine Meadows Lodge to SR-89 in snowy conditions, with snow banks preventing emergency vehicles from accessing the shoulder. The DEIR fails to consider these conditions in its traffic or hazards analyses. E3-8

D. <u>The DEIR Fails to Adequately Assess Impacts to Hydrological Resources.</u>

The DEIR notes that Bear Creek is impaired by sediment contamination, meaning that the creek already fails to support some designated and beneficial uses due to sediment impairment, such that any additional sediment loading to the creek would most likely be above its already-maxed out assimilative capacity, and would therefore be a per se significant effect. The DEIR acknowledges that, "Under the Total Maximum Daily Load for Sediment, the total assigned allocated load for Bear Creek is 321 tons/year" (DEIR 12-4), but the DEIR fails to estimate what the increased sediment load from the proposed Project would be, and whether that would come in under the load allocation. E3-9

The DEIR relies heavily on "low impact design" ("LID") development features to mitigate impacts associated with increased contaminated stormwater runoff from the proposed Project site. However, the DEIR offers conflicting evidence showing that LID, which relies upon the principle that rain water will infiltrate to permeable surfaces rather than runoff as sheet flow that entrains pollutants along the way, may not be feasible. "Gravel soils, cobbles, and boulders suggest a limited ability of site soils to support groundwater recharge via percolation of surface water." (DEIR 12-5.) Wouldn't these conditions impede the project's ability to maximize LID? E3-10

The DEIR relies heavily on the Appendix I *Preliminary Drainage Report*, but that report was "prepared for a proposed development of thirty-three (33) single-family residential lots, and fourteen (14) multifamily residential units in halfplex configuration to be located on approximately 46 acres in Alpine Meadows." (DEIR Appx. I at 1.) According to the DEIR, however, proposed Project Alternative A "would create a subdivision for the development of 47 single-family residential units and 5 secondary dwelling units on the ±47.3-acre property" (DEIR at 3-7), while proposed Project Alternative B "would construct 38 single-family residences and 5 secondary dwelling units . . . split into the West Side and East Side development pods. There E3-11

would be approximately 18.93 acres of land designated as open space" (DEIR at 3-13). The *Preliminary Drainage Report*, therefore, analyzed neither Alternative A nor Alternative B, and cannot support the DEIR's conclusions as to each alternative proposed project. E3-11 Cont.

The DEIR fails to consider the extent to which altered site hydrology and drainage would affect wetlands, riparian habitat, and ephemeral or seasonal streams, on site. In fact, these features are nowhere mentioned in the DEIR's Chapter 12 Hydrology. Instead, these impacts are considered in Chapter 6, Biological Resources. However, that chapter considers only that 'the single access road to the project site would cross Bear Creek. Roads within the project site would also cross the seasonal creek drainage three more times, and grading and construction for the proposed residential units would completely displace the ephemeral drainages. It is possible that one or more sites where a project road crosses a tributary might entail placement of fill or excavation within a jurisdictional water of the United States, or within a water of the state." (DEIR at 6-23.) In other words, Chapter 6 looks only to whether new construction would directly impact or alter these wetland or hydrologic features. This fails to consider whether altered site hydrology may deplete such wetlands or watercourses of the quantities, or timing, of water they may need to persist in their present state.[2] E3-12 E3-13 E3-14

Assessment and mitigation of Impact 6.2, which asks "[w]ould the project result in substantial habitat reductions affecting wildlife and plant populations," is further inadequate. (DEIR 6-17.) The DEIR notes that White Fir Forest would be largely removed by the proposed Project, and that these forests constitute habitat for special status species Sierra marten, Sierra Nevada snowshoe hare, long-legged myotis, and Cooper's hawk. (DEIR 6-18.) The DEIR then dismisses potential impacts to these species on the unsubstantiated basis that they are unlikely to use these forests as habitat "due to the proximity of existing development." (Id.) The DEIR fails to provide substantial evidence to support this conclusion. Ever-encroaching development will ultimately *force* special status species into habitat that is proximate to developed land. Nor does the DEIR articulate exactly what features of nearby land uses would necessarily drive away resident species, nor that those effects would exceed thresholds expected to render the study area uninhabitable. Finally, the DEIR fails to acknowledge that a good portion of the project site is adjacent to National Forest land, that improves the overall habitat quality of the study area. E3-15

The DEIR purports to avoid impacts to riparian habitat through use of a development setback, but notes that "in this additional setback, there shall not be any landscaping or hardscaping with the exception of mandatory measures for erosion control, defensible space, habitat restoration, and habitat maintenance." (DEIR 6-19.) No information is provided as to when these sweeping exceptions actually could destroy or impair riparian habitat. The DEIR asserts that "MM 6.2a through MM 6.2c would reduce that impact to less than significant by avoiding or minimizing construction impacts in areas of riparian habitat, and requiring E3-16

[2] See, e.g., https://water.usgs.gov/nwsum/WSP2425/hydrology.html

restoration or compensatory mitigation where avoidance is infeasible." "If road construction resulted either in fill or sedimentation within Bear Creek, impacts to riverine habitat would be significant. MM 6.2a through MM 6.2c would reduce impacts to less than significant by ensuring that no construction occurs that would substantially obstruct or divert any stream or seasonal drainage, and that if fill is introduced or any riverine habitat is disturbed, compensatory mitigation will be provided in the form of habitat restoration." (DEIR 6-20.) As discussed, below, however, these mitigation measures are inadequate. E3-16 Cont.

MM 6.2b provides that, "The project applicant shall submit a riparian habitat protection plan for review and approval by the Placer County Planning Services Division prior to approval of Improvement Plans for construction of bridges. The plan shall include architectural plans for each of the proposed bridge spans, shall detail any construction activities that may occur within the 50-foot seasonal or the 100-foot perennial riparian buffer, and specify best management practices (BMPs) that will be implemented to minimize impacts to riparian habitat. In the event that construction activities result in the removal or damage of any riparian habitat, the plan shall outline a restoration program to restore the riparian habitat at a 1:1 ratio in place or through a compensatory program as approved by the Planning Services Division." (DEIR 6-21.) This mitigation measure illegally defers evaluation of feasible and binding requirements that will ensure mitigation of these impacts to a future time. An EIR may not defer the formulation of mitigation measures to a future time, but mitigation measures may specify performance standards which would mitigate the project's significant effects and may be accomplished in more than one specified way. (*Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011; CEQA Guidelines, § 15126.4, subd. (a)(1).) Thus, "for [the] kinds of impacts for which mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. Where future action to carry a project forward is contingent on devising means to satisfy such criteria, the agency should be able to rely on its commitment as evidence that significant impacts will in fact be mitigated." (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275-1276.) Conversely, "Impermissible deferral of mitigation measures occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR." (*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 236.) For example, "[a]n EIR is inadequate if [t]he success or failure of mitigation efforts . . . may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92.) E3-17

Here, the DEIR's proposal that the applicant will submit a future plan for review contains no specific thresholds or measures to determine whether the impacts revealed by the plan would be significant, nor and performance standards to determine whether the mitigation measures selected would or feasibly could reduce any impacts to a less-than-significant level.

No actual mitigation measures are evaluated at all. The proposed mitigation measure simply states that the County will review and determine what, if any, mitigation measures should be required, with no guiding principles articulated whatsoever. E3-17 Cont.

Nor does the DEIR demonstrate that its proposal to mitigate losses by a payment of fees to restore or preserve *other* wetlands or riparian habitats would be feasible. First, the DEIR does not explain how restoration "in place" could mitigate these impacts; is this proposal to actually restore the impacts that the project caused? This seems directly at odds with the sequencing of MM 6.2b that arrives at this point, i.e., a finding that direct impacts cannot be avoided or mitigated. Nor does the DEIR provide any information demonstrating that payment of fees for offsite wetland acquisition and restoration would feasibly mitigate these impacts. A commitment to pay fees is not adequate mitigation if there is no evidence that mitigation will actually result. (See *California Clean Energy Comm. v City of Woodland* (2014) 225 Cal.App.4th 173, 197 (fee to offset urban decay impacts was not linked to any specific mitigation); *Gray v County of Madera* (2008) 167 Cal.App.4th 1099, 1122 (traffic impact fee was not adequate mitigation because no plan for requiring fees from other projects or definite commitment to make highway improvements was in place); *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692, 727 (requirement that project applicant pay funds to purchase replacement groundwater was not adequate mitigation because it was not known whether groundwater was available).) Here, the DEIR provides no information whatsoever for MM 6.2 that a compensatory program is in place with viable targets including resources of similar habitat quality and quality that could mitigate these losses. Offset compensation is a measure of last resort, and one historically fraught with difficulty and failure,[3] thus necessitating the EIR here to clearly demonstrate that any off site compensation would be feasible and effective. E3-18 E3-19

The DEIR asserts that "Impacts to riverine and riparian habitat from the possible removal of riparian habitat and road construction impacts to Bear Creek would be the same as those under Impact 6.2: potentially significant. MM 6.3a through MM 6.3c would reduce these impacts to less than significant" (DEIR 6-21); and therefore mitigations to these impacts are inadequate for the same reasons as discussed, above. E3-20

MM 6.4a requires proof that the Army Corp of Engineers has been notified of the project, but this fails to ensure that all proper permits will be obtained, since the Army Corp of Engineers receives substantial volumes of materials and may not take it upon itself to respond for any number of reasons. Instead of this open-ended requirement, the DEIR should require affirmative response from ACOE as to whether any ACOE permit would be required, and, if so, whether it has been obtained. E3-21

[3] See, e.g., https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/mitigation_finalreport_wo_app081307.pdf

MM 6.4b requires evidence of the type and amount of habitat purchased as compensatory off-set, but fails to specify that the type, quality, and amount must be equivalent to that lost by the project impacts. (DEIR 6-23 to 6-24.) MM 6.4b, sub. B includes no discussion of type, quality, or amount, at all. E3-22

E. <u>The DEIR Fails to Adequately Assess Avalanche Hazards.</u>

The DEIR fails to adequately consider the Project's potential to increase avalanche hazards. The Project will result in snow removal and movement, particularly on the slope above John Scott Trail which is a known avalanche area. Placer County has previously said the road should change the avalanche patterns; however, the DIER does not account for different snow loading below the road, especially if snow is blown onto the slope during snow removal from the road. If this slope slides, it is onto the John Scott Trail subdivision, which becomes the alternative access road in the valley when avalanches close Alpine Meadows Road. "CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could *exacerbate* hazards that *are already present* . . . The statutory language emphasizes how the analysis of a project's potential to exacerbate conditions is not an exception to, but instead a consequence of, CEQA's core requirement that an agency evaluate a project's impact on the environment." (*Cal. Building Industry Assn. v. Bay Area Air Quality Mgmt. Dist.* (2015) 62 Cal.4th 369, 386, emphasis added.) Here, the DEIR has failed to analyze and disclose the extent to which proposed Project activities would exacerbate avalanche hazards. E3-23

F. <u>The DEIR Fails to Adequately Assess Noise Impacts.</u>

The DEIR's analysis of noise impacts in lacking. One issue is the Environmental Noise Assessment the DEIR's analysis is based upon does not evaluate multiple alternatives. Rather, it appears to evaluate only Alternative A. (Compare DEIR at 3-27, Fig. 3-5, with DEIR App. F at 3, Fig. 2.) The DEIR itself does not appear to separately analyze the construction-related noise impacts of Alternative B, instead concluding that because "Alternative B would generate less traffic than Alternative A" and "develop fewer residential lots than Alternative A . . . impacts would be less than significant and no mitigation measures would be required." (DEIR at 8-15.) CEQA mandates that an "EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison," yet the DEIR fails to distinguish between Alternative A and Alternative B and fails to fully describe Alternative B's noise impacts. (Guidelines, § 15126.6, subd. (d).) This failure to fully disclose and evaluate the noise impacts associated with Alternative B violates CEQA and requires revision and recirculation of the EIR. E3-24

The evaluation of noise impacts is further deficient because it fails to mention or consider the potential length of construction. Neither Chapter 8—Noise nor Appendix F—Noise mention the length of construction as part of the evaluation of noise impacts. Appendix F states construction will "result in in short-term periods of increased noise levels," but there is no indication of how many days, weeks, months, or years the County intends construction to take, E3-25

and subsequently, no detailed information about how long increased noises from construction will impact nearby residences. (See App. F at 19.) There is also no information about varying construction noise levels during different phases of Project construction. As such, the DEIR has not provided "detailed information about the effect which a proposed project is likely to have on the environment" and is not an "adequa[te], complete[], and . . . good-faith effort at full disclosure." (*Center for Biological Diversity, supra*, 62 Cal.4th at 245; Guidelines, § 15003, subds. (i)-(j).) E3-25 Cont.

The DEIR also fails to mention impacts specifically to nearby recreational areas, such as the Bear Creek Association Pond. Appendix F contains a comment on the NOP expressing concerns about the Project's noise impacts on the pond, but the following response fails to respond to that concern specifically. (See App. F at 22.) We request that the County respond to comments and specifically address impacts to the Pond, which is in heavy use during summer months. E3-26

Another issue is the selected locations for which the DEIR evaluated construction noise impacts. Appendix F evaluates impacts on the Alpine Meadows Ski Resort at 1,300 feet away, but fails to address construction noises at other locations. (See App. F at 18.) Given that the Alpine Meadows Valley is narrow, which causes noises to echo and travel, the County should disclose and evaluate construction noises at other locations. E3-27

G. <u>The DEIR Fails to Adequately Consider Visual Impacts.</u>

Bear Creek Association is also concerned about the Project's impacts to visual resources, particularly from the scenic Five Lakes Trail. The DEIR recognizes that impacts to view from the Trail will be significantly impacted during and after construction, but concludes that impacts will be less than significant with mitigation. (DEIR at 5-8–12.) However, the proposed mitigation measures improperly defer mitigation until a later date. The measures include "Improvement Plans" and "Implementation Plans" to be implemented and approved, but the DEIR does not elaborate on what these plans will consist of or how their implementation will be ensured.

CEQA requires an EIR to include proposed mitigation measures to minimize the significant effects of a project. (Guidelines, § 15126, subd. (e).) "Formulation of mitigation measures should not be deferred until some future time." (*Id.*, § 15126.4, subd. (a)(1)(B).) Deferring formulation of mitigation measures until "a future time violates the rule that members of the public and other agencies must be given an opportunity to review mitigation measures . . . ." (*Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1393.) "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goal of full disclosure and informed decisionmaking; and consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92.) Courts have allowed agencies to defer formulating mitigation measures only when the E3-28

agency "commit[s] itself to *specific performance criteria* for evaluating the efficacy of the measures implemented." (*POET, LLC v. Cal. Air Resources Board* (2013) 218 Cal.App.4th 681, 738; see also *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 793 ["If mitigation is feasible but impractical at the time . . . it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them."].) This may be necessary where, for instance, "'practical considerations prohibit devising such measures early in the planning process . . . .'" (*Gentry, supra*, 36 Cal.App.4th at 1394, quoting *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1028-1029.)

E3-28 Cont.

The DEIR defers the development and implementation of mitigation measures for impacts to visual resources without the inclusion of specific performance standards, violating CEQA and failing to ensure the public that visual impacts will be less than significant. We recommend the County more fully develop the Improvement and Implementation Plans and recirculate the DEIR for public review and comment.

H. <u>The DEIR Fails to Include an Accurate and Stable Project Description.</u>

The DEIR fundamentally violates CEQA's procedures by circulating a DEIR that provides two competing alternatives—Alternative A and Alternative B—rather than a single proposed project. (*See*, *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) CEQA's procedures make it clear that an EIR must include both a "project description" (Guidelines, § 15124) and a discussion of "alternatives to the Proposed Project" (Guidelines, §§ 15126, subd. (f), 15126.6). Simply setting forth two "project alternatives" in an EIR, as here, without identifying which of the proposals is the "project" being proposed and which of the proposals are alternatives leaves the public and decision-makers with no way to clearly understand or comment on what action was being proposed. "'An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.'" (*San Joaquin Raptor, supra*, 27 Cal.App.4th at 730, quoting *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136, 1143, disapproved on other grounds by *Western States Petroleum Assn. v. Superior Court* (1995) 9 Cal.4th 559.)

E3-29

> Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance. An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.

(*County of Inyo, supra*, 71 Cal.App.3d at 192-193.) "[A] project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading." (*Treasure Island, supra*, 227 Cal.App.4th at 1052.)

E3-30

Here, the DEIR offers two project alternatives, rather than a single proposed project:

> This chapter also presents a detailed description of two alternative land use plans for the project – Alternative A and Alternative B. Alternative A represents the applicant's originally proposed project design while Alternative B presents another option for developing the project site. Alternative B was developed to reduce discrete impacts of Alternative A and is the applicant's preferred project. Both Alternative A and Alternative B are evaluated at an equal level of detail in this Draft Environmental Impact Report (EIR).

E3-30 Cont.

(DEIR 3-1.) Without a doubt, these are "conflicting signals to decision makers and the public about the nature and scope of the project." (*Treasure Island, supra*, 227 Cal.App.4th at 1052.) The lack of specificity as to which alternative is the lead agency's preferred project alternative is irregular at best and misleading at worst, if the presentation of two land use alternatives is being used to temper public opposition to the project the lead agency actually intends to carry out. This failure not only obscures for the public and other governmental agencies what the actual project being proposed entails, but it further complicates and undermines the DEIR's ability to assess project impacts. For example, the DEIR's Hydrology chapter relies heavily on Appendix I, *Preliminary Drainage Report*, but, as noted, the *Preliminary Drainage Report* assessed a project layout that was representative of neither Alternative A nor Alternative B.

E3-31

The Alameda County Superior Court recently set aside a project approval for violating CEQA in the same way the DEIR does here. In that case, *Washoe Meadows Community v. California State Parks and Recreation Commission* (Alameda County Sup. Ct. Case No. RG12-619137), also arising from proposed development in the Tahoe Basin, State Parks circulated a DEIR evaluating five proposed alternatives for project approval. As the trial court discussed:

> it appears that Parks circulated a DEIR when Parks was still collecting information and determining what it wanted to propose. . . . The comment period was then used to collect accurate information and to determine what project to propose. . .
>
> Looking at the record as a whole, it suggests that Parks was procedurally a step ahead of where it was in reality. The document captioned DEIR was actually more in the nature of scoping document similar to that anticipated by 14 CCR 15083, and the document captioned FEIR was actually more in the nature of a DEIR that contained an accurate map of the project site and proposed a specific project as anticipated by 14 CCR 15086. As a result of how the process proceeded, there was no opportunity for the public to review and comment on a specific proposed project as anticipated by 14 CCR 15087.

E3-32

(Exhibit A at 3.) The trial court continued:

> "The project description must be stable in the DEIR so that "affected outsiders and public decision-makers [can] balance the proposal's benefit against its environmental cost,

consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (Treasure Island, 227 Cal.App.4th at 1052.)" (Exhibit A at 11.)

"A DEIR that states the eventual proposed project will be somewhere in "a reasonable range of alternatives" is not describing a stable proposed project. A range of alternatives simply cannot be a stable proposed project." (Exhibit A at 13.)

"The court finds that by failing to identify a stable proposal in the DEIR, Parks prejudiced informed public participation. The CEQA Guidelines set out a procedure that provides an opportunity for public participation. (14 CCR 15080-15089.) Under the Guidelines, an agency does early public consultation (scoping) and then the agency circulates a DEIR. The agency must define the proposed project in the DEIR so that the public can comment on the proposed project during the 30 day comment period. (Pub Res. Code 21091(a); 14 CCR 15087.) "Comments are an integral part of the EIR." (*Sutter Sensible Planning, Inc. v. Board of Supervisors* (1981) 122 Cal.App.3d 813, 820.) The agency must provide written responses to the comments about the DEIR before certifying an environmental impact report. (14 CCR 15088.) Following the comment period, and assuming that the project does not change significantly in response to the comments and agency deliberation, the agency then circulates the proposed FEIR (the DEIR and the comments (14 CCR 15132)). An agency may, but is not required to, provide a comment period after circulation of a proposed FEIR. (14 CCR 15089(b); *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 40 Cal.App.4th 911, 936 fn 11.) An agency is not required to provide written responses to the comments about a proposed FEIR. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 567 ["There is no requirement that a lead agency respond in writing to comments submitted after expiration of the comment period."].) If the agency changes the project significantly in response to the comments and agency deliberation, then the agency must recirculate the EIR for further public comment. (14 CCR § 15088.5.) If there are no significant changes, then the agency holds a hearing and presumably approves the FEIR." (Exhibit A at 15-16.)

E3-32
Cont.

The County may argue here, unlike in *Washoe Meadows*, that the DEIR's two proposed project alternatives are less confusing to the public than the five project alternatives proposed by Parks in *Washoe*. However, CEQA's judicial standard of review dictates otherwise. Whereas a dispute based on an agency's interpretation of facts in the record may be afforded a more deferential "substantial evidence" standard of review, compliance with CEQA's mandatory procedures is not based upon an agency's interpretation of facts in the record, and rather, is subject to the court's independent review. Here, whether an EIR is based upon a single, accurate, and stable project description is a question of law:

> there is no room for deference to the public agency in determining whether a project description is stable. A project description must be stable so that the public decision-makers can balance the proposal's benefits against its environmental costs and otherwise evaluate the proposed project. (*Treasure Island*, 227 Cal.App.4th at 1052; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 654-657.) If a project description is not stable, then an agency's evaluation of evidence or exercise of discretion cannot make the project definition stable.

(Exhibit A at 10.) As the California Supreme Court described:

> Judicial review of these two types of error differs significantly: while we determine de novo whether the agency has employed the correct procedures, 'scrupulously enforc[ing] all legislatively mandated CEQA requirements' [citation], we accord greater deference to the agency's substantive factual conclusions. . . .

(*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.) "When the informational requirements of CEQA are not complied with, an agency has failed to proceed in 'a manner required by law' and has therefore abused its discretion." (*Save Our Peninsula Com. v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 118, quoting Pub. Resources Code, §§ 21168.6, 21005, subd. (a).)

E3-32 Cont.

Circulating a group of potential project alternatives rather than a single proposed project thwarts CEQA's review and participation policies. For example, "the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (PRC 21002.) Here, the confusion between which alternative is the proposed project and which is an alternative to the project unnecessarily complicates and derails this process. Indeed, the Legislature requires that CEQA review be conducted "in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources . . . ." (PRC 21003 sub (f).) Using the DEIR to scope project alternatives contradicts this policy, for example, by assuming the public and other governmental agencies wishing to review and comment on this DEIR will have the time and resources needed to provide detailed comments on not just one proposed project, but on two alternative projects. CEQA generally allows for less detail in an EIR regarding analysis of a project's "reasonable range of alternatives" than analysis of the project itself, but the DEIR here eschews this efficiency by presenting two alternatives at the same level of detail as a proposed project. (*See* CEQA Guidelines § 15126.6 sub (d).)

E3-33

I. <u>The DEIR Fails to Consider a Reasonable Range of Alternatives.</u>

E3-34

As noted, the DEIR impermissibly proposes two competing alternatives as the "proposed

project" and project description. But CEQA requires these two components be considered separately, that an EIR include a proposed project, and a reasonable range of alternatives to the project. Having used the alternative evaluation as a surrogate for the proposed project, the DEIR consequently fails to then provide a reasonable range of alternatives to the proposed Project. DEIR Chapter 16 discusses project Alternatives A – D; however, Alternatives A and B are considered as competing proposed projects, not as alternatives to the project. E3-34 Cont.

The DEIR's treatment of Alternative C is confusing at best. Dubbed the "No Project Alternative," the DEIR offers again two competing views on what the No Project Alternative should be, including both an "open space" alternative and a "development" no project alternative. This is again inherently misleading. The purpose of the alternatives evaluation is to provide an alternative to the proposed project that could be adopted. Here, the lead agency could reasonably determine to approve an "open space" alternative, nor a "future development" alternative. The DEIR's treatment of these alternative therefore subverts CEQA's informational and public participation requirements. E3-35

Finally, the DEIR offers Alternative D, the "Environmentally Constrained Alternative." Hardly a more pejorative and dissuasive name could have been chosen. This single actual development alternative to the proposed project cannot constitute a reasonable range of alternatives, as it is a single alternative.

Nevertheless, the DEIR notes that Alternatives C1 and D would reduce the proposed project's environmental effects, while meeting all of the project objectives in a feasible manner. A lower impact alternative, such as Alternative D, should therefore be selected if the project is to move forward. E3-36

J. Conclusion

Thank you for your careful consideration of these comments, and please do not hesitate to contact us at any time if we may be of assistance.

Very truly yours,

Jason Flanders
Partner, ATA Law Group
Counsel for Bear Creek Association

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

WASHOE MEADOWS COMMUNITY et al, Petitioners, vs. CALIFORNIA STATE PARKS AND RECREATION COMMISSION, et al Respondents.	RG12-619137 ORDER GRANTING PETITION FOR WRIT OF MANDATE AND [PROPOSED] STATEMENT OF DECISION Date: February 18, 2014 Time: 1:30 pm Dept.: 14

The Petition of Washoe Meadows Community et al (collectively "Petitioners") for a writ of mandate and for a request for judicial notice came on regularly for hearing on February 18, 2015, in Department 14 of this Court, Judge Evelio Grillo presiding. After consideration of the briefing and the argument, IT IS ORDERED: The petition for a writ of mandate is GRANTED. The court directs the clerk to issue a writ directing the California State Parks and Recreation Commission ("Parks") to to vacate the resolution dated January 23, 2012, approving the Final Environmental Impact Report ("FEIR").

PROPOSED STATEMENT OF DECISION

This is the court's proposed statement of decision. CRC 3.1590(f). In accordance with CRC 3.1590(g) the parties have fifteen (15) days from the date of service of this

order within which to file any comments or objections. If comments or objections are filed, the Court will determine whether, and if so when, a hearing will be scheduled on the comments or objections.

OVERVIEW.

A basic tenet of CEQA is that an environmental analysis "should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." (14 CCR § 15004(b); *Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1358-1359.) There is tension between these two goals, and the tension can be accommodated by staged or tiered environmental review. (*Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 139.)

In this case, it appears that Parks circulated a DEIR when Parks was still collecting information and determining what it wanted to propose. The result was a DEIR that lacked an accurate map of the project site and identified five alternatives rather than proposing a single project. The comment period was then used to collect accurate information and to determine what project to propose. When Parks circulated the FEIR, the map of the project site was more accurate and the document proposed a single project.

Looking at the record as a whole, it suggests that Parks was procedurally a step ahead of where it was in reality. The document captioned DEIR was actually more in the nature of scoping document similar to that anticipated by 14 CCR 15083, and the document captioned FEIR was actually more in the nature of a DEIR that contained an

accurate map of the project site and proposed a specific project as anticipated by 14 CCR 15086. As a result of how the process proceeded, there was no opportunity for the public to review and comment on a specific proposed project as anticipated by 14 CCR 15087. The central issues before the court are whether this procedural jumping the gun was permissible and whether it caused any prejudice.

EVIDENCE.

The court GRANTS Petitioners' request to take judicial notice of (1) the 2/14/13 stipulation in Washoe I and (2) the 2/14/13 order and final judgment in Washoe I. (Evid Code 452(c) and (d).)

The court GRANTS Petitioners' request to take judicial notice of (3) the Spring 2013 Project Update. (Evid Code 452(c).) The court also takes judicial notice that the Project Update is posted on the Restore the Upper Truckee website, which reflects that the document was added on 4/3/13. Judicial notice of the Project Update is distinct from whether, or for what purposes, the Project Update dated 4/3/13 and is relevant to the agency decision on 1/23/12 and therefore admissible evidence. (Evid. Code 350, 351.)

BASIC FACTS.

Land purchase. In 1984, the state purchased 777 acres of land to protect the Lake Tahoe watershed by preserving the wetlands and meadows on the parcel and to settle litigation. (AR 1917.) The state divided the 777 acre parcel, with 608 acres becoming Washoe Meadows State Park and 173 acres becoming the Lake Valley State Recreation Area to allow for operation of a preexisting golf course. (AR 3860-3863.)

Initial Public Input. (AR 3861-3864.) In the 1990s, California State Parks initiated studies to evaluate how to best restore the Upper Truckee River. (AR 3861.)

In 2003, studies identified the portion of the Upper Truckee River that runs through Washoe Meadows SP and Lake Valley State SRA as one of the two worst contributors of sediment to the Upper Truckee that degrade the quality of Lake Tahoe's water. (AR 181-183, 3861.) Parks initiated public noticing, scoping meetings, recreation planning workshops, public tours of the study area, and public meetings and hearings.

In 2006, Parks started a website (www.RestoreUpperTruckee.net) that provides information on the Project. In September 2006, Parks held four public scoping meetings to initiate the environmental review process. The Notice of Preparation for the scoping described four alternatives, including a "no action" alternative. It described Alternative 2 as the preferred alternative, but also stated that all alternatives would be analyzed at an equal level of detail. In response to public input during the scoping period, State Parks prepared its draft EIR without selecting a preferred alternative and added a fifth alternative of decommissioning the golf course.

In February 2007, Parks held two public planning workshops that each included four group exercises, including public input on existing recreation uses, and requesting input for Alternatives 2, 3 and 5 (Alternative 4 would remain same as existing).

In June 2008, Parks held two public site tours. It is unclear what Parks did in the way of investigation and scoping between June 2008 and August 2010.

DRAFT EIR. (DEIR). On 8/26/10, Parks and the Tahoe Regional Planning Agency ("TRPA") circulated a DEIR. (AR 142-1746; 1753.) The DEIR included a map of the project site that did not identify fens (a type of wetland) as a distinct vegetative

area. (AR 507.) The DEIR did not propose a specific project. The DEIR's executive summary states:

> Five alternatives are being considered and are analyzed at a comparable level of detail in the environmental document. A preferred or proposed alternative has not yet been defined. Following receipt and evaluation of public comments on the draft EIR/EIS/EIS, the lead agencies will determine which alternative or combinations of features from multiple alternatives will become the preferred alternative. A discussion of the decision will be included in the final EIR/EIS/EIS.

(AR 150.) The DEIR later described the project alternatives. (AR 202-203). In this latter section, the DEIR states:

> The full range of reasonable alternatives is presented for public review during circulation of the draft EIR/EIS/EIS. The selection of a preferred alternative would only occur after receipt of public comments on the draft EIR/EIS/EIS and preparation of responses to those comments. The alternatives described in this chapter include variations in both the golf course concept and in river restoration treatments to provide flexibility to State Parks, Reclamation, and TRPA in selecting the alternative that best meets the project objectives while taking into account the significant or potentially significant impacts upon the environment. The preferred alternative may be one of those presented or may be a modified combination of the golf course and river restoration features evaluated in this document.

(AR 203.) The alternatives section describes how Parks narrowed the options for the proposed project and identified five alternatives:

> ... The primary purpose of the project is to restore natural geomorphic and ecological processes along this reach of river and to reduce the river's suspended sediment discharge to Lake Tahoe while still providing access to recreation opportunities in Washoe Meadows SP and Lake Valley SRA. ... The alternatives carried forward are as follows:
>
> * Alternative 1 - No Project/No Action: Existing River and 18-Hole Regulation Golf Course
> * Alternative 2 - River Ecosystem Restoration with Reconfigured 18-Hole Regulation Golf Course
> * Alternative 3 - River Ecosystem Restoration with Reduced-Play Golf Course

> * Alternative 4 - River Stabilization with Existing 18-Hole Regulation Golf Course
> * Alternative 5 - River Ecosystem Restoration with Decommissioned Golf Course

(AR 203-204.)

In August and September 2010, Parks held three public information meetings, two public site tours a public open house, and in October 2010 held public meetings on the draft EIR. In addition, California State Parks consulted with the Washoe Indian tribe regarding protection of cultural resources. (AR 3864.) Parks provided a 60-day public review and comment period. In response to public requests, the review period was extended until November 15, 2010. Public hearings were held at the TRPA Advisory Planning Commission (APC) meeting on October 13, 2010, and at the Governing Board meeting on October 27, 2010, to present the project alternatives and to receive public comments. (AR 1753.)

FINAL EIR. (FEIR). On 9/14/11, Parks released the Final EIR. (AR 6, 1747-2939) The FEIR repeats the project objectives. (AR 1761.) The FEIR included a map of the project site that was more detailed than that in the DEIR and did identify fens as a distinct vegetative area. (AR 2829.) The FEIR states:

> The five alternatives addressed in the draft EIR/EIS/EIS are three golf course reconfiguration concept plans (reduced play, reconfigured 18-hole regulation, and no golf course) combined with two alternative river approaches (restoration and stabilization) and a No Project/No Action Alternative. These alternatives were formulated to represent a reasonable range of restoration approaches, golf course facility levels, and public access. A proposed Preferred Alternative has been identified in this final EIR/EIS/EIS based on the impacts analysis presented in the draft EIR/EIS/EIS and public and agency comments received during the comment period.

(AR 1760.)

Under the Chapter "Selecting a Proposed Preferred Alternative," the FEIR states:

> A refined project description for the proposed Preferred Alternative is also presented. The proposed Preferred Alternative is based on additional information developed since release of the draft EIR/EIS/EIS, including comments from the public, responsible and interested agencies, and organizations on the draft EIR/EIS/EIS.

(AR 1769.) The proposed Preferred Alternative was a variation on Alternative 2 - the River Ecosystem Restoration with Reconfigured 18-Hole Regulation Golf Course.

Washoe I. On 10/21/11, Parks approved a precursor to the Project (AR 3859.) This approval did not adopt any CEQA findings. Washoe Meadows Community filed a CEQA action alleging that Parks needed to make CEQA findings. (*Washoe Meadows Community v. California Department of Parks and Recreation*, Alameda County Case # RG11-605742 (*Washoe I*).) On 1/23/12, the Department set aside its prior resolution and adopted a CEQA certification.

The Approvals. On 1/23/12, Parks approved the EIR which included findings of fact and a statement of overriding considerations. (AR 5-10 and 11-67)

Post-Approval Proposal In or about 4/3/13, Parks circulated a document titled "Project Update" that stated:

> Despite the lawsuit, however, the California State Parks is committed to moving forward on restoration efforts in the Upper Truckee River corridor and have recently released a revised alternative in response to public input.
>
> The revised alternative (see map on back of this page) maintains the 18 hole regulation golf course but reduces the number of holes to be relocated to the west side of the river from 9 to 5 thus reducing project costs significantly. Additionally, the controversial southwest 20 acres of the property have been removed from the property based on feedback from the public.

The court refers to this as the "Post-Approval Proposal." Neither party has provided the court with the referenced "revised alternative" that according to the Project Update was

"recently released" as of April 2013. There is no indication in the record that Parks has recirculated any draft EIR seeking public comment on the Post-Approval Proposal.

Claims in this case. This case concerns Parks's circulation of the DEIR and subsequent certification of the FEIR and approval of the project on 1/23/12. This case does not concern the proposal at issue in *Washoe I* – that was a different project approval. This case does not concern the Post-Approval Proposal – that is an informational document regarding a potential project and is not a project approval.

DISCLOSURE – IDENTIFICATION OF A STABLE PROPOSED PROJECT.

Petitioner asserts that Parks failed to identify a stable proposed project in the DEIR and therefore failed to comply with CEQA. (Petn, para 44; Opening brief, pages 7-9.) "An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR." (*Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1358.) *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1052, states:

> [A] project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading. ... Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance.

The court holds that it is an issue of law whether the project description is stable and the court therefore applies its independent judgment. This appears to be an unresolved issue. In *Treasure Island*, 227 Cal.App.4th at 1055, the Court of Appeal

stated, "It appears an open question whether the adequacy of a project's description is analyzed as a question of law or an issue of fact." On its facts, however, *Treasure Island* appears to concern whether the project description was sufficiently specific or precise. *Treasure Island* stated that the EIR "contains binding, detailed standards governing virtually every aspect of Project development" and provided "concrete information regarding building heights, mass, bulk, and design specifications." (*Id.* at 1053.) *Treasure Island* stated, "the EIR cannot be faulted for not providing detail that, due to the nature of the Project, simply does not now exist" and cited 14 CCR 15146 for the proposition that "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." (*Id.* at 1054.) *Treasure Island* did not address whether the description was accurate[1] or stable.[2]

A project description is not required to have a high level of specificity (amount, precision, or detail of disclosure) in that it need not be an extensively detailed description. "The degree of specificity required depends on the type of project" and "The EIR must achieve a balance between technical accuracy and public understanding." (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28) (See also 14 CCR 15140, 15146, 15147, 15151.) "[I]f the asserted error concerns the amount or type of

---

[1] Regarding the difference between specificity and accuracy, in response to the question 2.4433 + 1.5567 = X, the answer of X = 4 would be accurate, but not specific, whereas the answer of X = 3.8034851 would be specific, but not accurate. The answer X = 4.0000 would be both accurate and specific.

[2] Regarding the difference between specificity and stability, in response to the question 2.4433 + 1.5567 = X, the answer of X = 4 would be stable (and accurate), but not specific, whereas the answer of X = either 3.8234, or 3.8769, or 4.000, or 4.1785 would have specific alternatives (one of which would be accurate), but not be a stable answer. The answer X = 4.0000 would be both stable and specific (and accurate).

information that is required by CEQA and necessary for an informed discussion, then the substantial evidence standard applies." (*Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 101-102.) If an EIR discloses accurate information that could have been more specific or detailed, then the court must defer to the agency's discretion regarding the EIR's specificity and detail.

In contrast, there is no room for deference to the public agency in determining whether a project description is accurate. A project description must be a correct description of both the initial project and any potential future actions that are both "reasonably foreseeable" and is a "consequence" of the initial project. (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222.) If a project description is not accurate, then an agency's evaluation of evidence or exercise of discretion cannot make the description accurate. Consistent with that analysis, case law states that the court reviews the accuracy of a project definition as a matter of law. (*Banning Ranch*, 211 Cal.App.4th at 1224 [court independently determines whether project description is improper piece mealing]; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 83, 98-99 [same].)

Similarly, there is no room for deference to the public agency in determining whether a project description is stable. A project description must be stable so that the public decision-makers can balance the proposal's benefits against its environmental costs and otherwise evaluate the proposed project. (*Treasure Island*, 227 Cal.App.4th at 1052; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 654-657.) If a project description is not stable, then an agency's evaluation of evidence or exercise of discretion cannot make the project definition stable.

Applying its independent judgment, the court finds that the DEIR did not identify a stable proposed project. The DEIR identified five alternative projects that spanned a range from (1) maintaining the existing river and existing 18-Hole Golf Course, to (2) restoring the river ecosystem and building a new 18-Hole Golf Course, to (3) restoring the river ecosystem and building a new 9-Hole Golf Course, to (4) stabilizing the river and keeping the existing 18-Hole Golf Course, to (5) restoring the River Ecosystem and decommissioning the Golf Course. (AR 237-264.) The DEIR was not proposing a stable project – it was identifying "a reasonable range of alternatives." (AR 1760.)

The FEIR identified a proposed project. The FEIR has a section titled "Project Description" that includes both the location and boundaries of the proposed project and a general description of the project's technical, economic, and environmental characteristics. (AR 1777-1802.) (14 CCR 15124.) It is, however, immaterial for purposes of the stability analysis that after the comment period was over that the agency identified a preferred proposed project in the FEIR. The project description must be stable in the DEIR so that "affected outsiders and public decision-makers [can] balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (*Treasure Island*, 227 Cal.App.4th at 1052.)

The "Project Update" circulated or or about 4/3/13 identified the Post-Approval Project, which Parks described as "a revised alternative in response to public input" and stated, "the controversial southwest 20 acres of the property have been removed from the property based on feedback from the public." This appears to be yet another possible iteration of the proposed project, and one that might involve significant changes given

that it would remove 20 acres from the property and resolves a controversy. (Pub. Res. Code 21166; 14 CCR 15162.) A project description that moves from a range of alternatives, to a revised Alternative 2, to a further revision does not look like a stable project description.

The court finds, however, that the Project Update and information about the Post-Approval Project is not admissible evidence on the issue of whether the project description is stable. Parks certified the EIR on 1/23/12, so the court evaluates the adequacy of the EIR as of 1/23/12. (Evid. Code 350, 351.) The most obvious basis for considering the Post-Approval Project in the stability analysis would be as evidence that Parks had a habit or custom of revising the project, which in turn would suggest that the project description was not stable. (Evidence Code 1105; *Clark v. Optical Coating Laboratory, Inc.* (2008) 165 Cal.App.4th 150, 174-175 [corporation can have habit or custom].) The sequence of DEIR, FEIR, and then Post-Approval Project is, however, too short and anecdotal to establish a pattern or practice and therefore does not amount to a habit or custom. Furthermore, even if Parks's continuing proposed revisions to the proposed project were a habit or custom, the court would exclude the Post-Approval Project because the continued efforts of Parks to improve the design of the project area to mitigate its environmental impacts are equivalent to a subsequent safety measure. (Evidence Code 1151.)

Parks argues that it is immaterial that it did not identify a preferred proposed project in the DEIR because the preferred proposed project in the FEIR was substantially similar to Alternative 2 in the DEIR. The FEIR states:

> A refined version of Alternative 2 is proposed by State Parks as the Preferred Alternative, ... The refined description of the Preferred

> Alternative was developed based on the analysis contained in the draft EIR/EIS/EIS; input from the public, organizations, responsible agencies, and other interested agencies; and comments on the draft EIR/EIS/EIS. ...
>
> Minor modifications presented below do not require recirculation of the EIR or a supplement to the EIS because these modifications do not change any significance conclusions presented in the draft EIR/EIS/EIS.

(AR 1777.) There are two problems with this argument.

The legal problem is that for a project to be stable the DEIR, the FEIR, and the final approval must describe substantially the same project. A DEIR that states the eventual proposed project will be somewhere in "a reasonable range of alternatives" is not describing a stable proposed project. A range of alternatives simply cannot be a stable proposed project.

Assuming that Parks could meet the stability requirement by identifying five alternatives and then picking one of the identified alternatives, the factual problem is that the FEIR did not provide information showing that Alternative 2 in the DEIR is substantially similar to the preferred proposed project in the FEIR. The FEIR states that the proposed project is a "refined version of Alternative 2" and that there were "Minor modifications," but the FEIR does not describe the refinements or modifications except where is describes the changes in the coverage calculations. (AR 2849-51.) The law might not require that a public agency describe each and every change, but adequate disclosure regarding the stability of a proposed project certainly requires more than conclusory statements. (*Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council* (2010) 190 Cal.App.4th 1351, 1388 ["'To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.'"].). Applying the substantial evidence standard to this disclosure issue

(*Madera*, 199 Cal.App.4th at 101-102), the court concludes that FEIR does not explain adequately why Parks concluded that Alternative 2 in the DEIR and the preferred proposed project in the FEIR are substantially similar and therefore are a stable proposal.

At the hearing on 2/18/15, Parks argued that it should be excused from identifying a proposed project in the DEIR because some members of the public thought it was too early to decide among the alternatives and wanted more deliberation. (E.g., AR 6087.) The court is not persuaded. The public agency has the responsibility to decide whether and when to initiate the EIR process and how to proceed with that process. A public agency is not excused from complying with a regulatory process because members of the public have asked the agency to deviate from that process.

The court applied its independent judgment in the above analysis of the stability of the project description. In the alternative, if the court were to apply the substantial evidence standard then the court would similarly find that the project description was not stable. The "range of alternatives" proposed in the DEIR is materially different from the modified Alternative 2 proposed in the FEIR.

The court moves to the issue of prejudice. *Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, 709, states:

> 'Noncompliance with CEQA's information disclosure requirements is not per se reversible; prejudice must be shown. ... [N]oncompliance with the information disclosure provisions of [CEQA] which precludes relevant information from being presented to the public agency ... may constitute a prejudicial abuse of discretion within the meaning of Sections 21168 and 21168.5, regardless of whether a different outcome would have resulted if the public agency had complied with those provisions." (CEQA, § 21005, subd. (a).) However, "[i]nsubstantial or merely technical omissions are not grounds for relief."
>
> [I]t is clear that because "there is no presumption that error is prejudicial" (CEQA, § 21005, subd. (b)), we cannot conclude that the [petitioners] are

> entitled to relief simply because the county failed to comply with CEQA. ... [W]e must look at the nature of the county's noncompliance to determine if it was of the sort that "preclude[d] informed decisionmaking and informed public participation."

(See also *Habitat and Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1286 ["The failure to comply with the law subverts the purposes of CEQA if it omits material necessary to informed decisionmaking and informed public participation."]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 183 Cal.Rptr.3d 898, 917-918 [similar].)

The court finds that by failing to identify a stable proposal in the DEIR, Parks prejudiced informed public participation. The CEQA Guidelines set out a procedure that provides an opportunity for public participation. (14 CCR 15080-15089.) Under the Guidelines, an agency does early public consultation (scoping) and then the agency circulates a DEIR. The agency must define the proposed project in the DEIR so that the public can comment on the proposed project during the 30 day comment period. (Pub Res. Code 21091(a); 14 CCR 15087.) "Comments are an integral part of the EIR." (*Sutter Sensible Planning, Inc. v. Board of Supervisors* (1981) 122 Cal.App.3d 813, 820.) The agency must provide written responses to the comments about the DEIR before certifying an environmental impact report. (14 CCR 15088.)

Following the comment period, and assuming that the project does not change significantly in response to the comments and agency deliberation, the agency then circulates the proposed FEIR (the DEIR and the comments (14 CCR 15132)). An agency may, but is not required to, provide a comment period after circulation of a proposed FEIR. (14 CCR 15089(b); *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 40 Cal.App.4th 911, 936 fn 11.) An agency is not required to provide written

responses to the comments about a proposed FEIR. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 567 ["There is no requirement that a lead agency respond in writing to comments submitted after expiration of the comment period."].) If the agency changes the project significantly in response to the comments and agency deliberation, then the agency must recirculate the EIR for further public comment. (14 CCR § 15088.5.) If there are no significant changes, then the agency holds a hearing and presumably approves the FEIR.

Parks circulated the DEIR with its range of reasonable alternatives on August 2010, the public had 60 days (extended to 80 days) to submit comments on the five alternatives (including Alternative 2), Parks considered and responded to the comments, Parks identified a stable project when it released the FEIR on September 14, 2011, and Parks approved the project on January 23, 2012. By failing to identify the specific stable project until the FEIR, Parks denied the public its right to consider and submit comments on a stable proposed project under 14 CCR 15087. This was prejudicial.

The court has considered that Parks gave the public the opportunity to comment on the FEIR from when Parks released the FEIR on September 14, 2011, until Parks approved the project on January 23, 2012. Parks announced the FEIR in formal documents and then distributed the announcement by mail, in newspapers, and on the internet. (AR 4160-4228.) Public agencies and the public sent letters to comment on the FEIR. (AR 5386 [EPA], 5392, 5407 [USDA], 5409-5478.) Parks scheduled meetings to discuss the FEIR for October 21, on December 7, and on December 14, 2011. (AR 4019-4153, 4211.) Therefore, the public was arguably provided the opportunity to participate after the release of the FEIR even though the public was denied the opportunity to

comment on a stable proposed project after release of the DEIR. The court is not, however, persuaded that the informal opportunity to comment reduced the prejudice to an insignificant level.

In setting the standard against which prejudice is measured, the court starts with the law that CEQA "is designed to ensure informed decisionmaking and informed public participation. (*Habitat and Watershed*, 213 Cal.App.4th at 1286; *Saltonstall*, 234 Cal.App.4th 549.) "The fundamental goals of environmental review under CEQA are information, participation, mitigation, and accountability." (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1164.) An action is prejudicial if it results in informed decisionmaking and participation below the standard.

The court then notes that CEQA "establishes a comprehensive scheme." (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086; *Parchester Village Neighborhood Council v. City of Richmond* (2010) 182 Cal.App.4th 305, 310.) Specifically, the CEQA Guidelines set out a detailed procedure involving the identification of a proposed project, preliminary scoping, drafting and distribution of a draft EIR, comments on the draft EIR, responses to the comments, a proposed final EIR, and approval of the final EIR. (14 CCR 15080-15092.) Although the prejudice requirement means that strict compliance is not required, the comprehensive nature of the CEQA Guidelines suggests that prejudice results where a public agency deviates substantially from the Guidelines.

The court finds on the facts of this case that the opportunities that Parks gave to the public to comment on the stable project identified in the FEIR were not an adequate

substitute for public's right to comment on a stable proposed project in a DEIR under 14 CCR 15087.

The court finds *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 197, to be comparable. In *Inyo*, the parameters of the proposed project were unclear because the EIR described the project as a 51–cubic–feet–per–second increase in subsurface pumping to supply water used in the Owens Valley but went on to analyze a project far greater in scope, including much higher rates of pumping and vast infrastructure needed to deliver water to Los Angeles County. (*Id.* at 189-190.) The problem with the EIR in *Inyo* was that the project description changed throughout the document itself. The court concluded:

> The incessant shifts among different project descriptions do vitiate the City's EIR process as a vehicle for intelligent public participation. (Id. at 197.)
>
> A curtailed, enigmatic or unstable project description draws a red herring across the path of public input. Among the public comments in the Final EIR were many objections and expressions of uncertainty aroused by the Department's homemade project description. (Id. at 198.)
>
> The small-scale groundwater project described at the outset was dwarfed by the 'recommended project' ultimately endorsed by the Final EIR and approved by the Board of Commissioners. Commencing with its modest proposal to pump an additional 51 cfs for 'unanticipated' uses within the Owens Valley, the Final EIR became the vehicle for an approval resolution dealing with important, large-scale phases of the City aqueduct management program. (Id. at 199.)

The Court is also guide by *Sutter Sensible Planning, Inc. v. Board of Supervisors* (1981) 122 Cal.App.3d 813. In *Sutter*, the agency circulated an initial draft EIR, made substantial revisions, and then adopted a "revised final" EIR. The court held "the failure to circulate the "revised final" EIR after the board found it necessary to have the original

"final" EIR redrafted to respond to significant public comments at the public hearing renders it procedurally inadequate." (*Sutter*, 122 Cal.App.3d at 823.)

Similarly, in this case, Parks's failure to identify a stable proposed project interfered with intelligent public participation because the public's attention, comments, and suggestions were diffused among the "range of reasonable alternatives" rather than focused on a stable proposed project. One public comment about the DEIR stated:

> An EIR also typically contains a preferred alternative. This EIR does not contain a preferred alternative, but the preferential text and detail of the analysis prevalent for alternative 2 in the EIR clearly favors alternative 2. ... The lack of specifying alternative 2 in the draft EIR as the preferred alternative is irregular and at best misleading to the public and appears as if it is being used as a way to temper the public response to the draft EIR/EIS/EIS. If the State Parks Department has no intention of moving forward with the project unless Alternative 2 was selected, this needs to be clearly stated in the EIR.

(AR 2412-2413.) The response to this written comment is non-responsive to the disclosure issue, stating, "The commenter's opposition to Alternative 2 and belief that it was given undue bias is noted. ... A comparison of relative environmental effects of all alternatives was included in Section 4.5 ... of the draft EIR/EIS/EIS." (AR 2423.)

This case is different from *Inyo* in that the project ultimately proposed and adopted was within the range of identified alternatives whereas in *Inyo* the project ultimately adopted as an undisclosed expansion of the proposed project. That acknowledged, the cases are similar in that the DEIR did not identify and adequately describe a stable proposed project with the result that the public was not given the opportunity to focus on that proposed project.

The court has considered *Treasure Island*, 227 Cal.App.4th at 1052-1055, and finds it distinguishable. In *Treasure Island*, the project description was accurate and

stable, and the issue was whether it was specific enough. In contrast, in this case the project description was not stable. Even if the DEIR provided accurate and specific descriptions of each of five alternatives in a range of alternatives, it would not compensate for the failure to identify a stable proposed project.

DISCLOSURE – POSSIBILITY OF TIERING AND FLEXIBILITY OF DISCLOSURE STANDARD

Petitioner argues that Parks cannot certify an insufficiently specific EIR by promising to prepare subsequent tiered EIRs under Pub. Res. Code 21093 as additional information becomes available. CEQA permits serial tiered environmental review. (Pub Res Code 21068.5; 21093(b); 14 CCR 15385.) If an agency approves a program level EIR, then the required specificity in the EIR will be appropriate to the level of the EIR. Therefore, if an agency proposes a program EIR then the court will not expect it to have the same level of specificity as a project level EIR. (*Town of Atherton v. California High-Speed Rail Authority* (2014) 228 Cal.App.4th 314, 343-345.)

In this case, the EIR itself does not state that it is a project or program EIR. The approval states:

> WHEREAS, the GPA and EIR will be used for tiering pursuant to Public Resources Code Section 21093, covering general goals and guidelines of the General Plan, as modified by the GPA, and the appropriate level of CEQA review for each subsequent project relying on the GPA; ...

(AR 6.) The possibility of future tiering does not affect the legal expectation that the EIR must be adequate for the matters at issue in this EIR. Regarding the issues of specificity, accuracy and stability, a program level EIR with a low level of specificity can

be followed by project level EIRs that address environmental issues with greater specificity, but an inaccurate or unstable program level EIR cannot comply with CEQA because the public and the decisionmakers cannot adequately evaluate the proposal and its environmental consequences even at a high level of generality. In this case, the DEIR did not identify a stable proposed project, and is is not relevant for that issue whether Parks might at a later date undertake further environmental review.

DISCLOSURE – CULTURAL RESOURCES

The environmental review process provides for public comment because comments can be "most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects." (14 CCR § 15204(a).) "[A]n adequate EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible. While the response need not be exhaustive, it should evince good faith and a reasoned analysis." (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 360.) (See also 14 CCR § 15088(c); *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029 ("EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation measure is facially infeasible").) "[T]technical perfection is not required ... The burden of showing that the EIR is inadequate is on the party challenging the EIR." (*Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1561.)

On issues of disclosure, "when a plaintiff asserts error based on the omission of information, independent review will apply if the information in question is required by CEQA and necessary to informed discussion. In contrast, if the asserted error concerns the amount or type of information that is not required by CEQA and necessary for an informed discussion, then the substantial evidence standard applies." (*Madera*, 199 Cal.App.4th at 101-102.)

Petitioner argues that the FEIR is deficient because it does not respond adequately to the comments of members of the Washoe tribe. (AR 2125, 2762.) The responses were adequate and explained that mitigation was designed to protect the resources. (AR 1842-1844.) As discussed below, Parks was not required to address how capping the cultural sites would affect the members of the Washoe tribe specifically.

DISCLOSURE – BIOLOGICAL RESOURCES

"Before the impacts of a project can be assessed and mitigation measures considered, an EIR must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined. (14 CCR 15125; 15126.2(a).) (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89.) (See *also California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 263.) "[B]aseline determination is the first rather than the last step in the environmental review process" and "the existing conditions must be determined, to the extent possible, in the EIR itself. (*Save our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 119-128

The DEIR contained a map of vegetation types in the study area that identified 21 different vegetation types. (AR507.) The FEIR states "Additional vegetation surveys and mapping were conducted during 2008 and 2010, by botanists" (AR 2827) and contained a map of vegetation types in the study area, but it identified 26 different vegetation types. (AR 2829.) In addition to the different vegetation types, the FEIR also identifies certain vegetation types as being in different locations.

Petitioner argues that the draft EIR failed to have an accurate baseline and that this failure deprived the public and the decisionmakers the opportunity to evaluate the proposal against the current conditions. Petitioner asserts that the clarification of the baseline was a significant change and that Parks erred by not recirculating the EIR with the accurate description of the baseline.

The court finds that the clarifications in the map of the vegetation were significant. Following the analysis in *Save our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 119-128, the impact of the project is measured against the baseline and therefore an agency cannot wait until the final EIR to provide accurate information about the baseline.

The court has not located substantial evidence to support the decision by Parks not to recirculate the EIR after Parks changed the map of vegetation types in the study area. The FEIR has a statement that "Minor modifications presented below do not require recirculation of the EIR or a supplement to the EIS because these modifications do not change any significance conclusions presented in the draft EIR/EIS/EIS." (AR 1777.) This conclusory statement is not substantial evidence or adequate analysis.

SUBSTANCE – REASONABLE RANGE OF ALTERNATIVES

CEQA requires that the agency consider "a reasonable range of potentially feasible alternatives," to "foster informed decisionmaking and public participation." (Pub Res. Code § 21002; 14 CCR § 15126.6(a) and (f).) "Since the purpose of an alternatives analysis is to allow the decisionmaker to determine whether there is an environmentally superior alternative that will meet most of the project's objectives, the key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1086-1089 .)

To start the process of identifying and evaluating alternatives, the lead agency must describe the project objectives. "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings.... The statement of objectives should include the underlying purpose of the project." (14 CCR § 15124(b).) "Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal." (*Surfrider Foundation v. California Regional Water Quality Control Board, San Diego* (2012) 211 Cal.App.4th 557, 582.) An agency's identification of the "project objectives" must be supported by substantial evidence. (*Habitat and Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1299-1300.) Petitioner does not challenge the identification of the project objectives, including the goal of "Maintain public golf recreation opportunity and quality of play to feasibly support a course." (AR 184.)

The purpose of identifying and evaluating "a reasonable range of potentially feasible alternatives" is to "foster informed decisionmaking and public participation." (Pub Res. Code § 21002; 14 CCR § 15126.6(a) and (f).) "What CEQA requires is "enough of a variation to allow informed decision-making." ... [The court] judge[s] the range of project alternatives in the EIR against "a rule of reason."" (*CNPS*, 177 Cal.App.4th at 988.) (See also *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 183 Cal.Rptr.3d 898, 917; *Habitat and Watershed Caretakers*, 213 Cal.App.4th 1277, 1302-1303.) "The selection will be upheld, unless the challenger demonstrates "that the alternatives are manifestly unreasonable and that they do not contribute to a reasonable range of alternatives." (*California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 988 ("*CNPS*".)

The DEIR presented the following five alternatives (AR 202-204):

- Alternative 1 - No Project/No Action: Existing River and 18-Hole Regulation Golf Course
- Alternative 2 - River Ecosystem Restoration with Reconfigured 18-Hole Regulation Golf Course
- Alternative 3 - River Ecosystem Restoration with Reduced-Play Golf Course
- Alternative 4 - River Stabilization with Existing 18-Hole Regulation Golf Course
- Alternative 5 - River Ecosystem Restoration with Decommissioned Golf Course

(AR 204.) The DEIR evaluated and compared these alternatives. (AR 202-302.)

It is a close call whether this is a reasonable range of alternatives. On the one hand, Petitioner asserts that Alternatives 3, 4, and 5 were not "potentially feasible alternatives" because before the DEIR had even been circulated the Parks staff had decided that only Alternative 2 was economically feasible for implementation. Petitioner points to an Hansford Economic Consulting report on the economic feasibility of the

Lake Tahoe Golf Course dated September 2008 (AR 1494-1614) that that concluded a reconfigured 18 hole fours was economically feasible, a reduced play area course was not economically feasible, and that operation of the area for non-golf events was not economically feasible. (AR 1501-1507.) Petitioner also points to a Staff Report for the October 27, 2011, TRPA meeting that stated:

> State Parks evaluated the economics of alternative ways to provide golf recreation at the SRA *(Lake Tahoe Golf Course Economic Feasibility Report,* Appendix E in the EIR), including a golf course with a reduced play area, such as an executive, par-3 course or a nine-hole course. This evaluation found that a golf course with a reduced play area would produce marginal revenues for a concessionaire and so would be susceptible to closure, making the Project infeasible under all but the most optimistic of circumstances. Because the Tahoe Paradise Golf Course, located about 2 miles from the SRA, already provides a reduced play golf course, developing an executive, par-3 course or a nine-hole course at the SRA would duplicate and compete with this existing recreation opportunity.

(AR3868.) There were Board statements at the October 27, 2011, TRPA meeting that an 18 hole golf course was the only financially feasible economic golf course alternative. (AR 1903, 4116, 4129.)

On the other hand, an EIR is not required to separately evaluate each facet of the Project and each facet of each plausible alternative. (*California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 994.) "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (14 CCR § 15204(a).) For example, in *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1028-1029, the court held that an EIR that discussed housing density alternatives of 0, 7,500, 10,000, 20,000, and 25,000 dwelling units as not deficient because it failed to specifically discuss a 15,000 unit alternative. The alternatives need only be reasonable and meet the goal of

fostering "informed decisionmaking and informed public participation." (*Cherry Valley Pass Acres and Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 348.)

The court concludes that the alternatives presented were sufficient to permit informed agency decision-making and informed public participation. Parks ultimately found that Alternatives 3, 4, and 5 were infeasible, but an agency's decision to reject each of the plausible alternatives and to adopt the project as proposed or modified by itself does not demonstrate that the agency erred in it selection of alternatives. (*Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 198-199.) The analysis of a "potentially feasible alternative" serves its purpose if it permits informed agency decision-making and informed public participation. (*CNPS*, 177 Cal.App.4th at 988.) The standard of review is "substantial evidence" and the fact that the certain alternatives were ultimately excluded as not financially feasible does not compel the conclusion that for purposes of providing a framework for discussion they were not "potentially feasible alternatives."

The court notes, however, that this conclusion presumes that Parks was permitted to present a range of alternatives in the DEIR and propose a stable proposed project only in the FEIR. Because the DEIR did not identify a stable proposed project, the alternatives reflected broad policy choices. If the DEIR had identified a stable preferred proposal, then a reasonable range of alternatives arguably would have been both more narrowly focused as alternatives to the preferred proposal and addressed variations on the proposed project.

Petitioner points to the Project Update as evidence that Parks continued to deliberate after the approval of the EIR that and in or about 4/3/13 Parks developed the

Post-Approval Proposal. Petitioner argues that the fact of continuing deliberation demonstrates that the deliberation before adoption of the FEIR was not adequate. The court finds that the Project Update and Post-Approval Proposal as not admissible evidence on the issue of whether the pre-approval deliberation was adequate. As noted above, the court evaluates the agency's decision as of the date of the decision and not with the benefit of hindsight (Evid. Code 350, 351) and an agency's further deliberation is in the nature of a subsequent remedial measure (Evid. Code 1151).

Furthermore, if the evidence were admissible for this purpose, then the court would give it little weight. An agency can continue to evaluate a project and make improvements throughout the CEQA process and after certification of an EIR. CEQA expressly permits and provides for further discussion and revisions. (Pub. Res. Code 21092.1, 21166; 14 CCR 15088.5 and 15162.) The court will not presume that pre-certification deliberation was inadequate just because an agency continues with post-certification deliberation. (*Dusek v. Redevelopment Agency* (1985) 173 Cal.App.3d 1029, 1041 ["The Agency did not abuse its discretion by adopting a narrower project than initially envisioned"].) (See generally *Tipton-Whittingham v. City of Los Angeles* (2004) 34 Cal.4th 604, 608-609 [court will not infer that lawsuit expedited regulatory timetable, as that would discourage voluntary acceleration of process].)

SUBSTANCE – CONSIDERING A POTENTIALLY FEASIBLE ALTERNATIVE

Petitioner asserts that Parks' disclosures and analysis were deficient because Parks did not consider a reasonable alternative that petitioner proposed on 1/25/12. (AR 5250-5253.) (*Habitat and Watershed Caretakers,* 213 Cal.App.4th at 1300-1305 (agency

failed to consider reduced development with limited water demands as a potentially feasible alternative); *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 876, 882-885 (agency failed to consider enclosed waste facility as a potentially feasible alternative); *Watsonville Pilots Ass'n*, 183 Cal.App.4th at 1086-1090 [agency failed to consider reduced development as a potentially feasible alternative].) In response, Parks argues that Petitioner did not present its proposed alternative until 1/25/12, which was only two days before the final hearing on the FEIR. (AR 5238, 5240.)

The court is guided by *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 567-568, which addressed the tension between "the duty of identifying and evaluating potentially feasible project alternatives [, which] lies with the proponent and the lead agency," the law that "There is no requirement that a lead agency respond in writing to comments submitted after expiration of the comment period," and the possibility that some objectors to some projects might rely on "the tactic of withholding objections, which could have been raised earlier in the environmental review process, solely for the purpose of obstruction and delay."

On the facts of this case, the court finds substantial evidence supports the decision by Parks to not separately consider the proposal made on 1/25/12, two days before the final hearing. The proposal was simply too late. The court notes, however, that this conclusion assumes that Parks complied with CEQA in presenting a range of alternatives in the DEIR and proposing a stable proposed project only in the FEIR. The lateness of Petitioner's proposed alternative is arguably a result of the fact that Parks did not identify a stable proposal in the DEIR and so Petitioner could not focus its efforts and articulate a

proposed alternative until after the FEIR was released, at which time the comment period was closed.

SUBSTANCE – CULTURAL RESOURCES.

The DEIR and FEIR disclose that there are four documented Washoe Indian cultural sites in the project area. The DEIR and FEIR propose to avoid impacts through a Combination of Site Capping, Project Design Revision, and Archaeological/ Washoe Tribe Monitoring. (AR 731, 1842.) Petitioner raises four issues.

First, Petitioner argues that the DEIR and FEIR are deficient because they do not discuss the alternative of redesigning the golf course to avoid the cultural sites. There is no merit to this argument. Proposed mitigation measure 3.9-2 (Alt 2) is to relocate the golf course. (AR 52, 376-377.) (Pub. Res. Code § 21083.2(b)(1).) The court notes that although the FEIR's recognition that Parks could redesign the golf course as a mitigation measure serves the purpose of mitigating cultural impacts, it raises the issue of whether a redesign of the golf course would require a re-circulated EIR.

Second, Petitioner argues that the DEIR and FEIR are deficient because they defer mitigation measures regarding the four documented cultural sites. An EIR must set out any required mitigation measures. (14 CCR 15126(e).) Although formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project, "If mitigation is feasible but impractical at the time of a general plan or zoning amendment, it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793.) *POET,*

LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 738, summarized the law as follows:

> First, the deferral of the formulation of mitigation measures requires the agency to commit itself to *specific performance criteria* for evaluating the efficacy of the measures implemented. Second, the "activity" constituting the CEQA project may not be undertaken without mitigation measures being in place "to minimize any significant adverse effect on the environment of the activity.

"Essentially, the rule prohibiting deferred mitigation prohibits loose or open-ended or performance criteria. Deferred mitigation measures must ensure that the applicant will be required to find some way to reduce impacts to less than significant levels. If the measures are loose or open-ended, such that they afford the applicant a means of avoiding mitigation during project implementation, it would be unreasonable to conclude that implementing the measures *will* reduce impacts to less than significant levels." (*Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 525.) (See also 14 CCR 15126.4(a)(1)(B); *Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 945-946.) The court evaluates an agency's deferral of mitigation efforts as a failure to comply with CEQA's procedural requirements and therefore reviews the decision de novo.

The court finds that Parks's mitigation measures regarding the documented sites are unlawful deferral of mitigation. The FEIR does not articulate a performance standard. The DEIR and FEIR state only that they propose to avoid impacts through a Combination of Site Capping, Project Design Revision, and Archaeological/ Washoe Tribe Monitoring. (AR 51, 731, 1842.) The FEIR hints, but does not state, that Parks will conduct further environmental review as it proceeds with the project. The resolution contains no commitment to further environmental review (AR 6), so Parks presumably

would conduct further review only if it is required or permitted under Pub. Res Code 21166 and 14 CCR 15162. This case is contrasted with *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 910, where the court found that the proposed deferral of mitigation was appropriate because the EIR committed the agency to prepare more thorough site-specific investigations before issuance of the relevant construction permits.

The court finds that Parks's mitigation measures regarding as yet undiscovered cultural resources and as yet undiscovered human remains are lawful deferral of mitigation. (AR 53-55, 737-739.) The DEIR and FEIR reasonably state that Parks will stop work, evaluate the situation, and implement measures appropriate to the situation and as required by law.

Third, Petitioner argues that the DEIR and FEIR are deficient because do not address the impact of the potential mitigation measures, and specifically the measure of "capping" cultural sites by covering them with dirt to preserve them for future research. The EIR adequately discusses capping. (AR 51-52.) Capping is a statutorily permissible mitigation measure. (Pub. Res. Code § 21083.2(b)(3).) The court finds that capping is a permissible mitigation measure on the facts of this case.

Fourth, regarding the impact of capping on the members of the Washoe tribe, CEQA is not concerned with "whether a project [would] affect particular persons." (*Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 782.) As a matter of CEQA law, the agency and court are concerned with how the project or a mitigation measure would affect the the public at large and are not concerned with the ability of the members of the Washoe tribe to access the cultural sites. The court

expressly does not address what obligations, if any, the state might have to the members of the Washoe tribe under other statutes.

SUBSTANCE – BIOLOGICAL RESOURCES - DEFERRAL OF MITIGATION OF IMPACTS.

As discussed above, an EIR must set out any required mitigation measures, but can defer such measures where the local entity commits itself to either specific performance criteria or subsequent environmental review. (14 CCR 15126(e); *POET, LLC v. California Air Resources Board* (2013) 218 Cal.App.4th 681, 738; *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 525.) The court evaluates an agency's deferral of mitigation efforts as a failure to comply with CEQA's procedural requirements and therefore reviews the decision de novo.

Petitioner asserts that the DEIR and FEIR unlawfully defer mitigation measures for protecting the fens and other wetlands. Regarding the proposal as adopted, the Resolution as adopted states:

> Mitigation Measure 3.5-3C1.
>
> To avoid potential adverse effects of golf course relocation and operation on the spring (mapped as lodgepole pine wet type and wet meadow, west of the Upper Truckee River the following mitigation measures will be implemented.
>
> CSP will develop and implement specific parameters and measures in accordance with Mitigation Measure 3.4-8 to ensure that the final design, operation, and management of golf course holes 9, 10, I 1, and 12 avoids potential direct and indirect impacts to the spring in Washoe Meadows SP.

(AR 39.) The mitigation plan suggests that Parks will at a later date develop a final design and that the final design will be subject to environmental review. The Resolution states:

> WHEREAS, the GPA and EIR will be used for tiering pursuant to Public Resources Code Section 21093, covering general goals and guidelines of the General Plan, as modified by the GPA, and the appropriate level of CEQA review for each subsequent project relying on the GPA; ...

(AR 6.)

The court finds that Park's mitigation measures are unlawful deferral of mitigation. This mitigation plan does not identify any "specific performance criteria" other than to "avoid[] potential direct and indirect impacts to the spring in Washoe Meadows." The FEIR hints, but does not state, that Parks will conduct further environmental review as it proceeds with the project. Parks presumably would conduct further review only if it is required or permitted under Pub. Res Code 21166 and 14 CCR 15162. The mitigation plan is, therefore, little more than a statement that Parks will comply with the law and redesign the golf course if required to do so by newly discovered significant impacts.

RECLASSIFICATION OF STATE PARK LAND

Petitioner argues that Parks violated Pub. Res. Code § 5002.2 by proposing to construct part of the reconfigured golf course within the current boundaries of Washoe State Park. Pub. Res. Code § 5019.50 states, "All units that are or shall become a part of the state park system, ... , shall be classified by the State Park and Recreation Commission into one of the categories specified in this article." Both State Parks and

SRAs are under the jurisdiction of the commission. (Pub. Res. Code § 5019.53 and 5019.56.)

Pub. Res. Code § 5002.2 states:

> (a) Following classification or reclassification of a unit by the State Park and Recreation Commission, and prior to the development of any new facilities in any previously classified unit, the department shall prepare a general plan or revise any existing plan, as the case may be, for the unit.
>
> The general plan shall consist of elements that will evaluate and define the proposed land uses, facilities, concessions, operation of the unit, any environmental impacts, and the management of resources, and shall serve as a guide for the future development, management, and operation of the unit.
>
> The general plan constitutes a report on a project for the purposes of Section 21100. The general plan for a unit shall be submitted by the department to the State Park and Recreation Commission for approval.

Petitioner argues that Parks violated Public Resources Code 5002.2(a) when it made plans for the development of the golf course within the current boundaries of Washoe State Park where the development of a golf course is currently prohibited. Under Petitioner's proposed reading of the statute, Parks was required to first reclassify land from State Park land to SRA land, and then prepare a general plan.

The court uses the established tools of statutory construction. The plain text of the statute requires Parks to first reclassify the land, then prepare a general plan, and then develop any new facilities. That chronology would, however, be absurd on the facts of this case, and the court will not read a statute to require an absurdity. Parks must first prepare an EIR and proposed general plan so it can determine what land it wants to reclassify from State Park land to State Recreational Area land. The court finds no violation of Pub. Res. Code § 5002.2(a).

///

FURTHER PROCEEDINGS.

Petitioner is to to prepare and submit a proposed judgment and proposed writ after review by Respondent. (C.R.C. 3.1312.) The proposed documents, or competing versions, are to be submitted by 4/17/15 so that the court can address any disputes at the CMC on 4/27/15.

DATED: _____ _____

Evelio Grillo
Judge of the Superior Court

Response to Comment Letter E3

ATA Law Group on behalf of Bear Creek Association
Jason Flanders, Partner
November 3, 2017

E3-1 The comment provides introductory comments and a summary of case law regarding the intent of CEQA.

The comment does not address the content of the Draft EIR or the project's environmental effects; thus, no response is required.

E3-2 The comment states that the Draft EIR provides inadequate cumulative analysis as it does not incorporate the Tahoe Basin Area Plan (adopted by the Placer County BOS in December 2016 and TRPA Board in January 2017) and the White Wolf Subdivision, among other proposed and approved plans and projects.

Please refer to Master Response 12 regarding the cumulative scenario and to Master Response 4 regarding the assumptions used for the cumulative traffic impacts analysis.

E3-3 The comment states that the White Wolf subdivision meets the 'probable future project' standard as the project was identified by the Placer County Planning Commission in January 2016, thus, the Draft EIR should have included in it in the EIR.

Please refer to Master Response 12 regarding the cumulative scenario and why the White Wolf project was not considered a reasonably foreseeable project during preparation of the Draft EIR.

E3-4 The comment states that the White Wolf project will contribute to cumulative impacts, specifically traffic, because it proposes 38 lots with 155 proposed parking spaces and is directly across Alpine Meadows Road from the proposed project.

Please refer to Master Response 12 regarding the cumulative scenario and to Master Response 4 regarding the assumptions used for the cumulative traffic impacts analysis. It is noted that the White Wolf site is currently being used for overflow parking for Alpine Meadows Ski Area, thus the provision of 155 parking spaces under the White Wolf project would not constitute a change from existing conditions.

E3-5 The comment states that the White Wolf project will also contribute cumulatively to air quality, emergency response/evacuation safety, losses in habitat, and increasing

sediment loads to Bear Creek; the agency (Placer County) should revise and recirculate the Draft EIR with the addition of an analysis of these impacts.

Please refer to Master Response 12 regarding the cumulative scenario and cumulative impacts analysis.

E3-6 The comment states that the traffic analysis is inadequate and fails to consider a number of factors, including the White Wolf Subdivision traffic.

Please refer to Master Response 12 regarding the cumulative scenario and to Master Response 4 regarding the assumptions used for the cumulative traffic impacts analysis.

E3-7 The comment states that the traffic analysis relies on one-day traffic surveys from 2011 and was last modeled in 2014; comments state that the data points do not represent actual conditions. The comment states that the County admitted that it is inadequate at the Planning Commission meeting on October 26, 2017 (DEIR hearing), thus the traffic study needs to be redone and the DEIR recirculated. Additionally, the comment states that the study and Draft EIR fail to incorporate increased traffic from trips between the proposed project and other Tahoe Basin destinations and analysis of vehicle trips and vehicle miles traveled. Finally, the comment states the traffic study skews the data by labeling a percentage as 'recreation homes' with lower daily trips without an assurance that the County would limit the use of the new homes and that it is possible that the recreational homes would actually result in more daily trips. The comment states that the Draft EIR fails to address maximum capacity, and the resulting traffic increases, for peak visitation periods.

Please refer to Master Response 4 regarding the Traffic Impact Analysis, the accuracy of the baseline condition used in that analysis, the validity of the trip generation assumptions, the use of the 30th highest peak hour traffic volumes rather than peak visitation periods, and the project's contribution to vehicle miles traveled within the Tahoe Basin. The comment provides no evidence or data sources to support the assertion that recreation homes could have higher trip generation rates than the rates used in the Traffic Impact Analysis. Moreover, the County staff did not state at the October 26, 2017 DEIR hearing for this project that the Traffic Analysis is inadequate.

E3-8 The comment states that the increased traffic from the project will impact emergency access in consideration of the 2016/2017 winter bumper-to-bumper traffic conditions on Alpine Meadows Road from Alpine Meadows Lodge to SR-89. The comment also

mentions concerns regarding the shelter in place proposals and potential that traffic from the proposed project would impede evacuations.

Please refer to Master Response 5 regarding emergency response in the project area and evacuation. Please refer to Master Response 10 regarding the proposed Shelter in Place provisions.

E3-9 The comment states that the Draft EIR fails to adequately address impacts to hydrological resources, especially sediment load to Bear Creek, which is already impaired by sediment contamination. The Draft EIR fails to analyze if the proposed project's contribution would be with the load allocation.

Please refer to Master Response 7, Hydrology and Water Quality, which discusses the Low Impact Design measures, Best Management Practices, and mitigation measures that would ensure the project does not contribute to the sediment load in Bear Creek and the Truckee River.

E3-10 The comment states that the Draft EIR relies heavily on Low Impact Design features to mitigate impacts but that the limited ability of site soils to support groundwater recharge would limit the effectiveness of the Low Impact Design features.

Please refer to Master Response 7 regarding the BMPs and Low Impact Design features proposed to be used at the project site and their suitability for use at the site.

E3-11 The comment states that the Draft EIR relies on a Preliminary Drainage Report that analyze a project description that differs from either Alternative A or Alternative B and thus cannot be used to support the Draft EIR's conclusions.

Please refer to Master Response 7 regarding the applicability of the Preliminary Drainage Report to both Alternative A and Alternative B. The project design on which the Preliminary Drainage Report is based is consistent with Alternative A as described throughout the Draft EIR.

E3-12 The comment states that the Draft EIR fails to evaluate the extent to which the altered hydrology would affect wetlands, riparian habitats and seasonal streams, which are only evaluated in the Biological Resources Chapter.

Please refer to Master Response 7 regarding the potential for the project to result in hydrologic changes.

E3-13 The comment states that roads in the proposed project will cross the seasonal creek drainage at least three times and that grading and construction would completely displace the ephemeral drainages.

The comment is correct and consistent with text on page 6-23 of the Draft EIR. The comment does not identify any inaccuracies or inadequacies of the Draft EIR and no further response is necessary.

E3-14 The comment states that the Draft EIR only looks at the direct effect of construction on the drainage features, wetlands, and riparian habitat and does not consider if the alterations to the project site's current drainage would result in adverse effects to wetlands or drainage features.

Please refer to Master Response 7 regarding the potential for the project to result in hydrologic changes.

E3-15 The comment states that Draft EIR fails to adequately support the conclusion in Impact 6.2 that the white fir forest onsite will not contain special-status species nor does it explain why nearby development would prohibit these species. The comment the states that encroaching development will force special-status species into habitat close to development; additionally, the comment states that the Draft EIR fails to acknowledge that a portion of the project site is adjacent to Tahoe National Forest land which would improve the overall habitat quality of the study area.

The Draft EIR analysis of the potential impacts to special-status species is based on the Biological Survey Report provided in Draft EIR Appendix B1. This report was prepared by a qualified biologist and is based on reviews of habitat characteristics in the region, literature review, and a survey of the project site. Thus, the conclusions in the Biological Survey Report reflect consideration of the adjacency of the site to the Tahoe National Forest and the habitat characteristics that are critical to the special-status species that have potential to occur in the project region. Draft EIR page 6-7 states "there is existing development and constant human presence within 1,000 feet uphill and downhill of the site, it is unlikely that the site provides suitable denning/nesting habitat for Sierra marten and Sierra Nevada snowshoe hare, but it may provide occasional foraging habitat." These findings are reiterated on Draft EIR page 6-19, and the conclusion in Impact 6.2 that the loss of white fir forest would have a less than significant impact to these special-status species is based on the fact that "the proposed development would not constitute a significant reduction in suitable habitat" because of the widespread presence of white fir forest in the project region. In summary, the loss of white fir forest is considered a less than significant impact because the human presence within 1,000 feet uphill and downhill of the site reduces

the habitat value of the project site for these species and the presence of more valuable habitat in the adjacent Tahoe National Forest makes it unlikely that special-status species use the project site other than for occasional foraging habitat.

E3-16 The comment states that no information is provided with regards to riparian habitat destruction as a result of erosion control, defensible space, habitat restoration, and habitat maintenance within the setbacks. The comment then states that Mitigation Measures 6.2a through 6.2c are inadequate as discussed in comments E3-17 through E3-19.

As described on Draft EIR page 6-19, the project would meet the stream setback requirements established in the Placer County Zoning Ordinance by avoiding development within 50 feet from the centerline of seasonal streams and 100 feet from the centerline of any perennial watercourse, other than as needed for roadway crossings of Bear Creek and the seasonal stream onsite. An additional 25-foot setback would be established adjacent to the minimum setbacks required under the Zoning Ordinance. The erosion control, defensible space, habitat restoration, and habitat maintenance activities referenced in the comment would only occur within this additional 25-foot setback and thus would not result in any direct impacts to wetlands or riparian habitat.

E3-17 The comment states that Mitigation Measure 6.2b improperly defers evaluation of feasible and binding requirements to a future time because there are no thresholds, measures, or performance standards that the required riparian habitat protection plan must meet.

Mitigation Measure 6.2b requires that the riparian habitat protection plan must include a requirement for the project applicant to restore any riparian habitat that is removed or damaged at a 1:1 ratio, either through onsite restoration or participating in an approved compensatory program. This minimum ratio provides the performance standard that ensures that any unavoidable impacts to riparian habitat are reduced such that the impact will be less than significant. This measure applies only to construction of roadway bridges and utility improvements, which is the only portion of the proposed project that has a potential to result in direct impacts to riparian habitat. When implemented in concert with Mitigation Measure 6.2a, which requires that all bridges constructed onsite be designed and built using a clear span technique that avoids permanent or temporary impacts to perennial or seasonal streams to the extent feasible. Mitigation Measure 6.2b (implement riparian protection plan) and Mitigation Measure 6.2c (compliance with California Fish and Game Code Sections 1600 - 1616) would ensure that impacts to riparian habitat remain less than significant.

E3-18 The comment states that the Draft EIR fails to demonstrate the feasibility and effectiveness of the mitigation requirement to pay fees to restore or preserve other wetlands or riparian habitats. The comment states that the Draft EIR does not explain the in place mitigation, which seems contrary to inclusion of Mitigation Measure 6.2b because direct impacts cannot be avoided or mitigated. The comment states that the Draft EIR does not provide any information showing that a compensatory program is in place that has viable targets including resources of similar habitat quality.

Mitigation Measure 6.2b and the analysis in Impact 6.2 does not state that it is not feasible to mitigate direct impacts to riparian habitat. Instead, direct impacts are expected to be largely avoided through implementation of Mitigation Measure 6.2a, which requires that all bridges constructed onsite be designed and built using a clear span technique. However, it is possible that grading necessary to place footings for bridges could require disturbance or removal of vegetation within riparian habitat areas as shown on Figure 6-1 and/or removal of riparian vegetation within the stream protection zone. Where such disturbance or removal is temporary, such as adjacent to the footings, replanting riparian vegetation (and monitoring to ensure successful establishment) would be feasible. If riparian habitat is removed and replanting in the immediate vicinity of the disturbance area is not desirable (because the area may not support additional riparian habitat), the riparian protection plan would require purchase of riparian habitat mitigation credits at an approved mitigation bank or restoration activities at another onsite or offsite location. These details would be included in the riparian habitat protection plan required under Mitigation Measure 6.2b. Text has been added to Mitigation Measure 6.2b to clarify the requirements for payment into a compensatory program. Specifically, that the payment must be to a wetland mitigation bank in the Sierra Nevada and the Tahoe-Truckee regions, that has been approved by the California Department of Fish and Wildlife, and that the specific compensatory mitigation for this project must entail establishment of riparian vegetation, enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the riparian corridors.

E3-19 The comment states that offset mitigation is a last resort, with known difficulties and failures, thus, the Draft EIR needs to demonstrate the feasibility and effectiveness of off-site mitigation.

As stated above, text has been added to Mitigation Measure 6.2b to clarify the requirements for payment into a compensatory program. Payment into wetland mitigation banks is a common mechanism for mitigating loss of wetlands and riparian habitat. As revised, Mitigation Measure 6.2b requires that payment be made to a

wetland mitigation bank that has been approved by the California Department of Fish and Wildlife. This would provide a reasonable expectation of successful implementation of the mitigation bank program.

E3-20 The comment states that Mitigation Measures 6.3a through 6.3c are inadequate for the reasons discussed in comment E3-17 through E3-19.

Please refer to the responses to comments E3-17 through E3-19.

E3-21 The comment states that there are flaws in MM 6.4a; in addition to requiring notification, the Draft EIR should require an affirmative response from the U.S. Army Corps of Engineers (Corps) as to whether or not permits are needed.

Draft EIR page 6-5 notes that the wetland delineation was verified by the Corps in 2010. If impacts would occur to less than 0.5 acre of wetlands, the project would likely rely on a nationwide permit that requires only pre-construction notification to the Corps, rather than an individual permit. Under the Clean Water Act, permits are required for any impact to the waters of the United States. As noted on Draft EIR page 6-22, the project site contains 0.2 acres of perennial stream (Bear Creek), 0.56 acres of seasonal stream, and 0.11 acres of ephemeral drainage. The project is expected to result in direct impacts to the ephemeral drainage and may result in direct impacts to Bear Creek and the seasonal stream, depending on the final construction details for the bridges spanning these features. Mitigation Measure 6.4a requires that the Clean Water Act permits necessary to authorize direct impacts to wetlands be obtained prior to the County's approval of Improvement Plans. This would ensure that all proper permits are obtained.

E3-22 The comment states that Mitigation Measure 6.4b is inadequate because it does not specify that the type and amount of habitat purchased under this measures must be equivalent to the habitat lost by the project impacts.

Text has been added to Mitigation Measure 6.4b to clarify that the replacement habitat must be of the same type, quality, and quantity as the habitat lost due to development.

E3-23 The comment states that the Draft EIR fails to adequately consider the project's potential to increase avalanche hazards due to snow removal and storage, particularly on the slope above John Scott Trail.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regrading avalanche hazards. As documented in these responses, the project is not expected to increase avalanche hazards.

E3-24 The comment states that the Draft EIR's analysis of noise impacts is lacking because the Environmental Noise Assessment only evaluates Alternative A and does not provide an analysis of construction-related noise impacts.

Please refer to Master Response 6, Noise. The analysis of Alternative A and Alternative B does not fail to allow for meaningful evaluation, analysis, and comparison between the two project designs. Alternative B has fewer dwelling units and would generate less traffic than Alternative A. Therefore Alternative B would generate less traffic noise. Since the impacts of Alternative A related to increases in traffic noise levels are less than significant, and the impacts of Alternative B would be less than the impacts of Alternative A, there is no need to quantify the noise levels specific to Alternative B. The noise analysis properly concludes that under either Alternative A or Alternative B the transportation noise levels would be below the Federal Interagency Committee on Noise criteria presented in Draft EIR Table 8-3 and would not result in a noticeable increase ambient noise at sensitive receptors in the project area.

E3-25 The comment states that the Draft EIR's evaluation of noise impacts is inadequate because the analysis fails to consider the potential length of construction. The comment notes that the Environmental Noise Assessment (Draft EIR Appendix F) states that construction will result in short-term periods of increased noise levels, but does not indicate the specific amount of time that construction is expected to take and for how long increased noise levels from construction will occur. The comment expresses that there is no information about varying construction noise levels during different phases of Project construction.

Please refer to Master Response 6 regarding the length of time needed for construction and the potential for construction noise to affect existing residents in the area.

E3-26 The comment asserts that the Draft EIR fails to mention impacts specific to nearby recreation areas, including the Bear Creek Association Pond. The comment notes that comments on the Notice of Preparation for this EIR identified concerns regarding the project's noise impacts on the pond, and that this comment is included in the Environmental Noise Assessment (Draft EIR Appendix F, page 22), but the response fails to address noise levels at the pond.

The Bear Creek Association pond is located north of Bear Creek and the residences located on John Scott Trail. The comment on the Notice of Preparation for this EIR that is addressed in the Environmental Noise Assessment requests consideration of the potential for noise from traffic on proposed Road A to be audible within the Bear

Creek Association, including at the pond. As discussed in Master Response 6, Noise, the Environmental Noise Assessment demonstrates that noise from Road A would be lower than the noise from existing traffic along John Scott Trail and is expected to be less than 46 decibels, which is well below the County's maximum allowable noise for residential land uses of 60 decibels. Since the pond is further away from Road A than John Scott Trail is and is further screened by topography and vegetation, noise levels at the pond from Road A would be less than 46 dB and would be within the County's maximum allowable noise for residential land uses of 60 decibels.

E3-27 The comment expresses concern regarding the locations that were selected to be evaluated for construction noise impacts in the Draft EIR. The comment states that noise impacts on the Alpine Meadows Ski Resort, located 1,300 feet from the site, are evaluated in Draft EIR Appendix F, but impacts to other locations are not addressed. The comment requests that construction noise impacts to other locations be evaluated, as the Alpine Meadows Valley is narrow, which causes noise to echo and travel.

Refer to Master Response 6 regarding the selection of sites where existing noise data was collected and projected noise levels were modeled and the potential for the project to create adverse noise impacts to existing residents in the vicinity. The analysis in the Environmental Noise Assessment related to the Alpine Meadows Ski Resort considers whether ski resort operations (such as snowmaking) would generate noise levels that could expose residents of and visitors to the project site to unacceptable noise levels. The analysis does not consider the impact of the proposed project on the ski area. Due to the relatively low noise levels associated with the project and distance from the ski area, the project is not anticipated to result in noise impacts to the ski area. The Environmental Noise Assessment and Draft EIR evaluate the impacts of the project on existing residences in the Alpine Meadows valley, as discussed in Master Response 6.

E3-28 The comment states that the Draft EIR fails to adequately consider visual impacts, especially from the Five Lakes Trail, and that the EIR defers mitigation for visual impacts by relying on improvement plans and implementation plans without elaborating on the plans' contents, implementation process, or specific performance standards.

Please refer to Master Response 2, Visual Resources, regarding the project's impacts to visual resources and the visual character of the area as seen from the Five Lakes Trail as well as from neighboring residential subdivisions, including the specific impacts associated with tree removal and vegetation management. In Section 2.2.5, Master Response 2 discusses implementation of the proposed Architecture Handbook and the design requirements contained therein to ensure the proposed subdivision is

compatible with the existing visual conditions in the project area. Finally, Master Response 2 Section 2.2.6 demonstrates that reliance on the future Improvement Plans to ensure the project's design requirements are met does not constitute deferred mitigation because the EIR and the County's development standards include specific performance standards that must be met to ensure visual impacts remain less than significant.

E3-29 The comment states that the Draft EIR fails to include an accurate and stable project description and fundamentally violates CEQA by providing two alternatives rather than a single project and a reasonable range of alternatives, which is confusing to the public and to decision-makers.

Please refer to Master Response 13, Alternatives. Draft EIR Section 3.4 provides a clear and stable description of Alternative A, which is identified as the proposed project. Moreover, Section 3.5 includes a description of Alternative B and identifies Alternative B as being subject to co-equal analysis to Alternative A. The description of both project alternatives is carried forward in the remainder of the Draft EIR and both alternatives receive an equal weight analysis in the Draft EIR.

E3-30 The comment states that the Draft EIR uses two alternatives instead of a single proposed project and that this is impermissible under case law that found a project description "that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading."

Please refer to Master Response 13, Alternatives. The Draft EIR provides a detailed and specific description of Alternative A and Alternative B. The nature and scope of each alternative is well-defined through text and figures, including the proposed tentative subdivision map for each alternative provided in Draft EIR Appendix B. Further, the nature and scope of both alternatives is similar – either would develop a residential community on the project site with one development pod on the western portion of the site, near Alpine Meadows Road, and a second development area on the eastern portion of the site. Vehicular access to and through the project site would be the same under either alternative.

E3-31 The comment states that the lack of the lead agency's 'preferred alternative' is irregular and misleading. The comment suggest that if the use of two land use alternatives is intended to reduce public opposition, this approach obscures, complicates, and undermines the Draft EIR's ability to assess project's impacts. The comment references the preliminary drainage report as an example, noting that it evaluates a layout that does not reflect either Alternative A or Alternative B.

Please refer to Master Response 13, Alternatives. The introductory paragraph in Chapter 3, Project Description explains that: "Alternative A represents the applicant's originally proposed project design while Alternative B presents another option for developing the project site. Alternative B was developed to reduce discrete impacts of Alternative A and is the applicant's preferred project." Please refer to Master Response 7, Hydrology and Water Quality, regarding the validity of the preliminary drainage report for evaluating the impacts of both Alternative A and Alternative B.

E3-32 The comment references the *Washoe Meadows Community v California State Parks and Recreation Commissions* case heard by the Alameda County Superior Court and states that this EIR violates CEQA in the same way as the EIR at issue in that case, which considered five proposed alternatives.

Please refer to Master Response 13, Alternatives. The approach used in this EIR is meaningfully different from the EIR in the Washoe Meadows case because of the level of detail and specificity in the project description and tentative subdivision maps for Alternative A and Alternative B. Each alternative has a stable and detailed project description along with accurate maps of the project site and design. Further, the impact analysis is specific to each alternative, and the EIR clearly states which mitigation measures are applicable to each alternative. In contrast to the Washoe Meadows case, this Draft EIR does not provide for a project that might be somewhere between Alternative A and Alternative B, but is clearly either Alternative A or Alternative B.

E3-33 The comment states that the Draft EIR eschews the CEQA process by analyzing two alternatives as the proposed project as it unnecessarily confuses, complicates, and derails the CEQA review process.

Please refer to Master Response 13, Alternatives. The Draft EIR clearly evaluates and identifies mitigation for the project-specific impacts of Alternative A. The Draft EIR also clearly evaluates and identifies mitigation for the project-specific impacts of Alternative B. As stated above, Chapter 3 of the Draft EIR clearly explains the reason for inclusion of both alternatives. Further, the practice of evaluating an alternative at an equal level of detail as the proposed project is common throughout the state and does not deprive the public and decision-makers of information about the project's impacts, and does not confuse the CEQA review process.

E3-34 The comment states that the Draft EIR impermissibly proposed two competing alternatives as the 'proposed project' and that the Draft EIR fails to provide a reasonable range of alternatives.

Please refer to Master Response 13, Alternatives. In Chapter 1 and Chapter 3, the Draft EIR clearly states that Alternative A is the proposed project and that Alternative B was developed to reduce discrete impacts of Alternative A. Thus Alternative B meets CEQA's requirement to evaluate alternatives that are capable of meeting most of the basic project objectives while reducing or avoiding the significant impacts of the project. The Draft EIR also considers a no project alternative that would leave the project site vacant (as required by CEQA), a no project alternative in which the site is developed according to the current land use and zoning designations (another version of the no project alternative), and an alternative that seeks to increase avoidance of environmental resources. Further, the Draft EIR describes two additional alternatives that were initially considered but rejected from further analysis due to infeasibility.

As stated in Draft EIR Section 16.7.3, "the selected alternatives constitute a reasonable range of project alternatives due to their consideration of different variations in the size and layout of proposed project components." CEQA does not establish a specific number of alternatives that musts be included in an EIR, rather it defines that the intent of the alternatives analysis is to identify ways to reduce or avoid the significant impacts of a proposed project. As noted in Draft EIR Section 16.7.3, neither the proposed project (Alternative A) nor the co-equal alternative (Alternative B) would result in any significant and unavoidable impacts. As noted above, the applicant has determined as a consequence of this EIR analysis that Alternative B is the applicant's preferred project.

E3-35 The comment states that Alternative C is confusing and misleading as it provides two competing views on a 'no project alternative' and that the lead agency could not adopt either and thus the Draft EIR does not meet CEQA's informational and public participation requirements.

Please refer to Master Response 13, Alternatives. CEQA requires that a no project alternative be considered and allows that it may involve leaving the project site in its existing condition or it may involve development of the site if it is considered likely that another development application would be filed. In this EIR, both scenarios are evaluated. CEQA does not require that the decision-makers be able to immediately adopt a particular alternative; in most cases the alternatives analysis is not sufficiently detailed to allow for adoption of an alternative without further environmental review or recirculation of the Draft EIR. CEQA simply requires that the alternatives be feasible to implement.

E3-36 The comment states that Alternative D is the single, actual alternative and as a single alternative, does not constitute a reasonable range of alternatives. The comment goes on to state that as a lower impact alternative it should be selected. The commenter

also provides a conclusion statement pertaining to consideration of the letter, which does not require any specific response.

Please refer to Master Response 13, Alternatives and response to comment E3-34 regarding the reasonable range of project alternatives.

Comment Letter F1

Shirlee Herrington

From: steve anderson <am4bed@gmail.com>
Sent: Sunday, September 24, 2017 10:11 AM
To: Placer County Environmental Coordination Services
Cc: tmooers@sierrawatch.org
Subject: Alpine sierra subdivision DEIR
Attachments: condo lots numbered.png

Hi Shirlee,
I'm a little baffled and disappointed that the DEIR does not address the approximately 10 ACRES i own that boarder the proposed subdivision.
My acreage is between the subdivision and the ski area.
The subdivision has a road that parallels my land. Please see attached map of the numbered land parcels i own. The parcel number 2 has the parallel road. F1-1
At one point the proposed road is 2 feet away from my property line. I would like to know what provisions are being made to protect my property during road construction. I would also like a commitment that my land will not be used for snow storage. F1-2
Thanks
Steve Anderson

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095-520-001-000

Response to Comment Letter F1
Steve Anderson
September 24, 2017

F1-1 The comment questions why the Draft EIR does not address 10 acres of land adjacent to the project site. The comment states that the proposed project's Road A would pass within 2 feet from the property line between the project site and the commenter's property. The comment requests information on how the adjacent property would be protected during road construction.

As shown in the tentative subdivision map for alternatives A and B (Draft EIR Appendices B1 and B2), proposed Road A would pass close to the rear property lines of existing parcels on Chalet Road, upslope from the project site. In most locations, Road A would be at least 20 feet away from the adjacent property lines. However, as shown on sheet 3 of the tentative subdivision map, Road A would pass within approximately 5 feet of the adjacent property located immediately south of the intersection of Road A and Court C.

The project does not propose to disturb any area of property that is outside the boundaries of the project site. If the project is approved, the project developer would be required to submit detailed construction plans to the County for review prior to issuance of grading and building permits. These plans would show the limits of all grading, placement and height of retaining walls, placement of erosion control and water quality facilities, and all other proposed site improvements. The County would ensure that these improvements would not directly affect any neighboring property and that all graded areas are appropriately stabilized such that no portions of any neighboring properties would be subject to erosion or localized ground failure. Sheet 3 of the tentative subdivision map indicates that a retaining wall is proposed to be constructed between the adjacent property to the south and proposed Road A.

Since the project would not directly affect the adjacent property, and no development is anticipated on that property in the cumulative scenario, there is no need for the EIR to specifically discuss or evaluate it.

F1-2 The comment requests a commitment that this adjacent property would not be used for snow storage.

Please refer to Master Response 8 regarding snow storage. The proposed tentative subdivision map identifies snow storage easements throughout the project site that would be sufficient to meet the project's snow storage needs without affecting any adjacent property. The Homeowner's Association would be required to conduct snow

removal for all onsite roads and to store the snow within the designated snow storage easements. The project applicant does not propose to store snow on any adjacent properties.

Comment Letter F2

Shirlee Herrington

Subject: FW: Comments on Alpine Sierra Subdivision- please enter in record and publish

From: steve anderson [mailto:am4bed@gmail.com]
Sent: Saturday, October 21, 2017 10:51 AM
To: Alexander Fisch
Subject: Comments on Alpine Sierra Subdivision- please enter in record and publish

The biggest problem for the residents of Alpine Sierra will be snow removal and snow storage.
Last winter Alpine Ski area got 58 feet of snow.
With some settling that probably resulted in 20 feet of firm snow.
Alpine Sierra has a mile of roads 24 feet wide. The volume of 20 feet of snow on that road is equivalent to the volume of 1200 (twelve hundred) 30' motor homes. The volume of snow removed from the driveways of the houses is another 200 30' motor homes.
So the problem is where to put the 1400 motor homes. But they have a 20' easement for those motor homes.
That is assuming that the easement doesn't also get 58 feet of snow. The only storage is my lots and Lot A.
My lots , that I've been assured will not be used for snow storage , will probably hold 200 motor homes.
The other 1200 motor homes will have to be stored on Alpine Sierra's Lot A. They will be pushed over the downhill side of Road A, towards Bear Creek Association. They will eventually end up on Bear Creek property.
Fortunately for my lots, the project will be built out in phases. The first phase has nowhere to store snow, except for pushing it onto Bear Creek property. I don't think they will be too happy with that. I think they have the resources to use legal action to prevent further phases from occurring and damaging their property.
So that hopefully will be the end of this poorly planned project. My lots will be saved.
Submitted by Steve Anderson owner of 10 acres adjoining Alpine Sierra.
The 10 acres has over 1000 lineal feet of common border with Alpine Sierra.

F2-1

Response to Comment Letter F2

Steve Anderson
October 21, 2017

F2-1 The comment states the biggest problem for the residents of Alpine Sierra will be snow removal and snow storage. The comment states that Alpine Ski Area received 58 feet of snow in the 2016-2017 season, and that this amount settled into 20 feet of firm snow. The comment notes that Alpine Sierra has one mile of roads that are 24 feet wide and discusses the volume of snow that may be received on those roads and the correlating demand for snow storage. The comment states that the project will have difficulty finding available space to store snow and expresses concern that snow will eventually end up on the neighboring Bear Creek Association property.

Please refer to Master Response 8 regarding the proposed provisions for snow storage.

Comment Letter F3

Rachelle Latimer
9 Bates Blvd.| Orinda, CA 94563| rachelle.latimer@gmail.com

October 29, 2017

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Alex:

As I mentioned at the Planning Commission meeting, I appreciate the County's efforts to work with the applicants on the Alpine Sierra Development to create Alternative Plan B. This is certainly an improvement, yet there are still negative impacts on the environment. Below are my comments from the meeting along with a few additional items: F3-1

1. CEQA Scoping
Though the DEIR asserts (pg 1-3) there was no "new" information received subsequent to the 2014 NOP, Placer County in fact received formal applications and undertook administrative processing of the Village at Squaw Valley development project, the Squaw/Alpine Gondola project, and the White Wolf Development project. All of these proposals have direct and/or indirect impact on the Alpine Sierra Development, as well as all the homeowners in Alpine Meadows. F3-2

2. Scoping Comments
Comments of significant importance to homeowners in Alpine Meadows and to the natural resources of the area that were submitted to Placer County and appear to be ignored in this DEIR include: F3-3

- Traffic patterns and safety at the project access to Alpine Meadows Road given the White Wolf Development almost directly across the street.
- Snow removal, onsite snow storage, and hydrological changes to neighboring properties. F3-4
- Emergency vehicle ingress/egress especially during Level F conditions, the Highway 89 intersection, and Highway 89 northbound to Truckee and southbound to Tahoe City.
- The request for updated traffic analyses (versus using outdated and minimal traffic survey information for modeling) was ignored. F3-5
- The visual impacts to Five Lakes Trail was identified as a significant issue by the public. The trail is likely the most popular and heavily used trail in the region. The analysis is weak at best. F3-6
- Water resource impacts were identified as potentially significant in scoping comments, including groundwater recharge and impacts to Bear Creek. Having addressed these issues by "Best Management Practices" assertions, without any actual site analysis of the adequacy on these steep slopes and large cut-and-fill actions, is insufficient. F3-7

3. Biological Resources
- How is it possible to do defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F3-8

- The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described. F3-9

- Run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the associated impact on fish should be considered. F3-10

- The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is **not** development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter. F3-11

- The riparian habitat has been identified as a sensitive resource. The analysis that the impacts to the locations where roads cross the on-site streams is faulty. There are lots that are adjacent to the riparian area that will certainly disturb the riparian habitat. The buffer between the riparian area and home sites should be even larger. F3-12

4. Hydrology

- Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of of potential impacts and mitigation measures? Do they recommend more study? F3-13

- Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F3-14

5. Traffic

- The traffic analysis relies on one-day traffic surveys from 2012, a drought year. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years with drive times taking upwards of 2-hours to travel from Alpine Meadows Lodge to Truckee and 1.75-hours to travel from the Lodge to Tahoe City. This analysis needs to be redone. F3-15

- The analysis also assumes that a majority of the houses will be “recreational homes,” which have “relatively low” traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the

tendency to pack large groups of people into such rentals. The final EIR should take this into account. F3-15 Cont.

- The DEIR does not address the White Wolf Development proposed project directly across Alpine Meadows Road from this site. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions.

- The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered in the final EIR. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F3-16

- In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F3-17

6. Hazards

- The Draft EIR proposes a 2-part mitigation of the single ingress/egress: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. Is this realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life. F3-18

- Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slop below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F3-19

Thank you again for the opportunity to submit comments on the DEIR for the Alpine Sierra Development. Hopefully these comments will aid the County as it creates a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Rachelle Latimer
Bear Creek Association

Response to Comment Letter F3

Bear Creek Association
Rachelle Latimer
October 29, 2017

F3-1 The comment expresses appreciation for the efforts of the County and project applicant to develop Alternative B, which the commenter sees as an improvement over Alternative A, although the commenter notes that Alternative B would still result in negative environmental effects.

The comment does not address the adequacy of the EIR or identify any specific environmental concerns. No further response is necessary.

F3-2 The comment states that the statement in the Draft EIR that no new information was received subsequent to publication of the Notice of Preparation is incorrect because the County received applications for other development projects – specifically the Village at Squaw Valley Specific Plan, the Squaw/Alpine gondola project, and the White Wolf project. The comment states that these projects "have direct and/or indirect impact on the Alpine Sierra Development, as well as all the homeowners in Alpine Meadows."

Please refer to Master Response 12 regarding the cumulative scenario.

F3-3 The comment states that the EIR ignores potential environmental effects that are of significant importance to homeowners in Alpine Meadows and that were submitted to Placer County. Specifically, this comment states that the EIR ignores "Traffic patterns and safety at the project access to Alpine Meadows Road given the White Wolf Development almost directly across the street."

Please refer to Master Response 4 pertaining to project impacts on traffic and Master Response 12 regarding the cumulative scenario and response to comment F6-3 regarding intersection spacing.

F3-4 The comment states that comments submitted to Placer County regarding snow removal, onsite snow storage, and hydrological changes to neighboring properties were ignored in the EIR.

Please refer to Master Response 8 regarding the proposed provisions for snow storage and Master Response 7 regarding the proposed project's impacts related to water quality and hydrology.

F3-5 The comment states that comments pertaining to emergency vehicle ingress/egress (especially during Level F conditions), the Highway 89 intersection with Alpine Meadows Road, and the segments of Highway 89 northbound to Truckee and southbound to Tahoe City were ignored in the EIR.

Please refer to Master Response 4 pertaining to project impacts to Traffic, and Master Response 5 pertaining to Emergency Response and Evacuation.

F3-6 The comment states that the analysis of the visual impacts to the Five Lakes Trail "is weak at best."

Please refer to Master Response 2 regarding impacts to views from the Five Lakes Trail.

F3-7 The comment states the addressing the impacts to groundwater recharge and Bear Creek through BMPs is insufficient.

Please refer to Master Response 7 regarding water quality and hydrology.

F3-8 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, in regards to the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F3-9 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources, which explains that the requirements of Mitigation Measure 6.5a are typical for development projects throughout California and would not substantially delay construction or lengthen the construction schedule. In the event that the construction schedule were lengthened, Mitigation Measure 6.5a and all other biological resource mitigation measures would continue to be implemented and would ensure that impacts to wildlife remain less than significant. Please also refer to Master Response 6, Noise,

which discusses the effects to noise that would be expected under a lengthened construction schedule. In regards to air quality impacts, the total emissions generated by construction would not increase due to a lengthened construction schedule. It would be expected that emissions in any single year would be less than those evaluated in the Draft EIR, and thus impacts would remain less than significant..

F3-10 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F3-11 The comment references the conclusion in the biological resources assessment (Appendix D of the Draft EIR) that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources and response to comment E3-15.

F3-12 The comment states that the analysis regarding the identified riparian habitat is faulty because there are proposed residential lots that are adjacent to and would disturb riparian habitat. The comment states that the buffer between the riparian area and home sites should be larger.

Refer to response to comment E3-16, which states that the project would meet the stream setback requirements established in the Placer County Zoning Ordinance and would establish an additional 25-foot setback beyond the setbacks required under the Zoning Ordinance. Activities within that additional setback would be limited to erosion control, defensible space, habitat restoration, and habitat maintenance activities. Outside of localized impacts associated with bridge construction, no direct impacts to wetlands or riparian habitat would occur within the stream protection zone.

F3-13 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F3-14 The comment questions whether or not an evaluation has been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River.

Refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

F3-15 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study.

F3-16 The comment states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer Master Response 12 regarding the validity of the cumulative impacts analysis.

F3-17 The comment expresses concern regarding the enforceability of Mitigation Measure 7.3a to remove snow from the corner of the project entrance and Alpine Meadows Road during a "big snow year."

Refer to Master Response 8 regarding the snow storage and removal. As with any roadway intersection or driveway intersection onto a road, during a big snow year and/or snow event, visibility is temporarily reduced for a period of time. The project HOA would be responsible for removing snow to provide adequate sight distance for vehicles exiting the onsite access road onto Alpine Meadows Road.

F3-18 The comment questions if the County has performed a feasibility study regarding using fire resistant building materials and shelter-in-place and if it makes sense to store diesel storage tank next to the shelter. Finally, the commenter states that fire-resistant building materials and a shelter in place facility will not prevent the loss of life during a large forest fire.

Refer to Master Response 10 regarding the shelter-in-place provisions. Shelter in place provisions were developed in consultation with the North Tahoe Fire protection District (NTFPD), which is the serving fire agency contracted to the Alpine Springs County Water District (ASCWD) for fire protection services. The inputs of both the NTFPD and the ASCWD have been incorporated into the Emergency Preparedness and Evacuation Plan. In addition, the Forest Health and Fuel Management Plan was coordinated with the NTFPD and revisions to that plan have been incorporated into the final version (Final EIR Appendix J2). Both agencies have indicated that they will serve this project and the NTFPD has stated that if approved and operated, the project would meet State fire prevention standards and would have a higher level of emergency preparedness and defensibility from wildfire than existing development in the vicinity.

F3-19 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs. These factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The comment asserts the DEIR does not use current science to discuss or analyze how the project will

influence future conditions onsite, above and below the project site, the ingress/egress on Alpine Meadow Road.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

Comment Letter F4

October 30, 2017

Shirlee Herrington
Placer County Environmental Coordination Services Division
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Re: Draft EIR for Alpine Sierra Subdivision (SCH# 2014042028)

Dear Placer County,

This letter provides comments on the Draft EIR for the proposed Alpine Sierra Subdivision (SCH# 2014042028). Thank you for your consideration of my comments.

I will state upfront that there is overlap in my comments between different sections, and this is in part due to the piece-meal approach of the Draft EIR and the fact that various impacts are inter-related, such as traffic and hazards (safety) to name just one of several areas of intersection. F4-1

Cumulative Impacts

Chapter 15 of the EIR (Cumulative Impacts) lists 10 projects on the Cumulative Projects List (Table 15-2). Noticeably absent from this list is the proposed White Wolf Subdivision which is a proposal to develop approximately 74 acres located within the 460-acre property owned by Troy Caldwell. The project development area is located on Alpine Meadows Road approximately 2.5 miles south west of State Route 89 and approximately 0.5 miles north of the base of Alpine Meadows resort. The project is proposed to include resort, residential and recreational uses, including a ski lift, as well as parking and roadways. F4-2

The Cumulative Impacts analysis of the Alpine Sierra project should be re-done to include the proposed White Wolf project. The combination of the Alpine Sierra project and the White Wolf project will have significant cumulative impact on traffic, fire safety, noise pollution, visual resources, and potentially water availability. Even if a technicality eliminates the requirement to consider White Wolf, the Planning Commission should do the right thing and consider all major projects proposed in the area.

Despite the fact that the Cumulative Impacts analysis excludes White Wolf, it is evident in the analysis that the Alpine Sierra project contributes to significant cumulative impact to the visual resources in Alpine Meadows and to the scenic vistas seen from the Five Lakes Trail. The Five Lakes Trail and associated vistas are a state treasure that should be preserved for future generations. The report concludes that there is a **significant cumulative impact** to visual resources in the vicinity. However, the DEIR states that this can be mitigated by use of various building materials. F4-3

- Any reasonable person would have to conclude that regardless of building materials, 38 homes, 5 guest houses, an HOA building, equipment yard, and road (all part of the "reduced" Alternative B) will have a significant cumulative impact on the visual resources from the popular Five Lakes Trail as well as from other vantage points in Alpine Meadows. And this is before adding the cumulative impact of the proposed homes in White Wolf, along with a lodge, parking areas, roads, and other recreation structures, and the proposed gondola with 37 towers. F4-4

The Cumulative Impacts appendix states that cumulative noise levels of this project and other planned projects in the area "… would be a **significant** cumulative impact; however, the proposed project would not result in a cumulatively considerable contribution to this impact." This conclusion is nonsensical. If this project does not create cumulative considerable contribution to the impact, which project does? The point of the cumulative impacts analysis is to avoid a cumulative significant impact. The cumulative impact of the proposed Gondola project, the Alpine Sierra project, the F4-5 F4-6

Stanford Chalet project, and the White Wolf project will significantly impair the peaceful enjoyment of public lands, including the Five Lakes Trail and entry into the Granite Chief Wilderness. The County Planning Commission should not just ignore this by concluding that any one individual project does not result in "cumulatively considerable contribution to this impact". I urge the Placer County Planning Commission to do the right thing and decline this project as proposed. F4-6 Cont.

Biologic & Related Impacts

- The Biologic Survey Report says that the special-status Yellow Warbler was observed on the site. As a result, the report concludes that before any tree removal or mechanized equipment operation of any kind, from May 15 to August 15, surveys must be conducted for nesting yellow warblers and if any adult yellow warblers are detected during the survey, no equipment operation should occur within 100 feet of the detection site until it is conclusively determined that no nest is present. It is already known that yellow warblers are present in the site. As a result, this significantly hinders construction in the site since the May to August timeframe covers the majority of the building season in Alpine Meadows. The result is that the construction and disturbance to residents and wild life would be over a very prolonged number of years. And the Draft EIR has not analyzed the impact of construction noise over this prolonged period. F4-7
- In addition, the report says:
  "It is also likely that other special-status wildlife species could occasionally make use of the site, specifically Sierra marten, Sierra Nevada snowshoe hare, and long-legged myotis. Given that there is existing development and constant human presence within 1,000 feet uphill and downhill from the site, it is unlikely that the site provides suitable denning/nesting habitat for the marten and hare, but may provide occasional foraging habitat."
  - The report reaches a faulty conclusion that special-status wildlife will not be impacted. There is not currently development within 1,000 feet to the East of the eastern boundary of the proposed site and lots. In order to determine if nesting sites of these species will be impacted, the survey needs to look within 1,000 feet of the entire perimeter of the proposed Alpine Sierra site. F4-8

Impact of Construction on Noise and Light Pollution, Visual Resources

There would be significant impact to noise and light pollution and visual resources in the area from the long-term construction of this site. The length of this project is evident from the amount of infrastructure that must be constructed, the viable construction periods, and the fact that at least three phases are proposed – 3 phases in alternative B and 4 phases in alternative A.

- The draft EIR analysis of the impacts of the prolonged construction period is very weak. The EIR must evaluate how many years of construction are likely in order to build the road and bridges, prepare the lots and infrastructure, sell the lots and construct on the lots, and then evaluate the impacts of this prolonged construction period. Many people are estimating that it is likely a 15-20 year period of construction. F4-9

For example, the Draft EIR fails to evaluate the noise impacts of prolonged construction on the BCA Pond, a community feature in BCA that is heavily used all summer by many families. All construction noise in the narrow Alpine Valley is loud and echoes throughout the valley. Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the BCA pond and neighborhood. F4-10

Fire Safety

In discussing potential climate changes, the Hazard Report says:

"It is likely warmer temperatures with a decrease in snowfall amounts and snowpack levels would result in a stronger snowpack and fewer and smaller avalanche events. It is F4-11

unlikely these conditions would increase the maximum runouts of the avalanche paths above the proposed Alpine Sierra development.
The effect of these types of climate changes on forest health and wildfire could be considerable. Earlier runoff with rising temperatures may result in longer fire seasons, larger more destructive fires and a general increase in the fire risk."

In addition to fire danger increasing in Alpine Meadows, there is only one road in and out of the valley. Adding further development to this high-risk area will significantly increase the risk that evacuation will not be successful in the event of a large forest fire. What if there is a downed tree on Alpine Meadows Road? What if Highway 89 is backed up with traffic, as it often is. Adding further development in this dangerous location will further risk the lives of residents. If the Placer County Supervisors approve this development, what will be their responsibility to residents when disaster strikes? F4-11 Cont.

Further, the Hazard appendix of the EIR summarizes that:
"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

These enhanced requirements include constructing the homes with fire resistant materials and stating that "If evacuation is not feasible or appropriate, HOA staff shall ensure that the HOA Shelter-in-Place facilities are open, and coordinate activities at the facilities".

Knowing that the site does not meet the County Zoning Ordinance which requires at least two vehicle entry/exit points, it is not prudent for the County Planning Commission to simply rely upon the use of fire-resistant building materials and shelter-in-place HOA facilities. Knowing the high probability of a large forest fire at some point in this area, it would be shameful for the County Planning Commission to sidestep the County Zoning Ordinance in order to satisfy further development interests. The fire-resistant building materials and shelter-in-place facilities will be a joke when a large forest fire hits. The County Planning Commission should keep true to the County Zoning Ordinance and conclude that the proposed Alpine Sierra development does not meet minimum emergency standards. F4-12

Further, any new development in this area should not be allowed to have outdoor fire pits. Currently the Project Description (Chapter 3) says: "Outdoor fire pits and fireplaces would be fueled using propane or natural gas." F4-13

Traffic Impact on Alpine Meadows Road

The Draft EIR analysis relies primarily on one-day traffic surveys to develop the modeling. For winter traffic, the date was Sunday March 11, 2012 on which the analysis said the peak morning traffic was 10:45-11:45am. It is evident to people familiar with Alpine Meadows that the winter traffic is typically much heavier in the January/February timeframe and from approximately 8-9am, and of course during a heavier snowfall year than 2012. Using data from only one year, and an extremely low snowfall year, is unacceptable analysis. F4-14 In addition, the Draft EIR fails to address the traffic impact of the proposed White Wolf project directly across Alpine Meadows road. F4-15

In addition, the Draft EIR fails to address the cumulative traffic impact on the north and south-bound Hwy 89 traffic, and the resulting impact on emergency response time. F4-16

Further, the County's willingness to waive county standards (as documented in the Draft EIR language below) fails to recognize the dangerous impact of ice and snow on Alpine Meadows road and puts users of this road at risk.

- "The design of this intersection is required to meet Placer County Roadway Standard Plate 116. However, the project applicant has requested a Design Exception (Option 4) to the Plate 116 standards due to the project site's narrow frontage onto Alpine Meadows Road. The project proposes to reduce the radius for inbound and outbound right turns to 25 feet and reduce the taper offsets to 4 feet to F4-17

avoid encroachment into the neighboring property and minimize and/or eliminate potential retaining walls within the County right-of-way. The modified design would continue to allow vehicles to enter and exit Road A without encroaching on other lanes. The County has preliminarily approved the Design Exception request (Option 4)." F4-17 Cont.

The county assertions of level of service ("LOS") A and B for Alpine Meadows Road and Highway 89 do not reflect the actual conditions experienced in 2017 which was often 2-hour drive times from Truckee to Alpine Meadows Lodge, and 1.75-hour drive times from Alpine Meadows Lodge to Tahoe City. To suggest the Alpine Sierra development would add just 1-second additional time for a vehicle getting through the Alpine Meadows Road/Highway 89 signal (Table 7.4, Chapter 7) is contrary to actual experiences in both the winter and summer of 2017. F4-18 F4-19

In the Transportation chapter, the Draft EIR attempts to address the impact of truck construction traffic on the safety of residents (see quote below). How can the County conclude that a construction traffic management plan, <u>that is not yet designed</u>, will result in a less than significant impact to emergency access and response, particularly given the overlapping construction periods of the proposed Alpine Sierra and White Wolf developments.

- *"Additionally, during project construction, truck traffic on Alpine Meadows Road could interfere with emergency responders' access to the site and surrounding areas. To ensure that construction traffic is managed such that it does not create congestion or interfere with circulation on Alpine Meadows Road, Mitigation Measure 7.4c requires that the project applicant prepare a Construction Traffic Management Plan that shall be subject to approval by the Placer County Department of Public Works and Facilities Transportation Division. The County will ensure that the Construction Traffic Management Plan includes appropriate measures to ensure that construction traffic impacts to public streets are minimized and a high level of safety for all roadway users is maintained. With implementation of Mitigation Measure 7.4c, construction of Alternative A would have a* ***less than significant*** *impact related to interfering with emergency access and response."* F4-20

<u>Hydrology and Snow Impact</u>

Water resource impacts were identified as potentially significant in the scoping comments, including groundwater recharge (which does occur on site), impacts to Bear Creek and snow storage influences on offsite drainage patterns. It is insufficient that the Draft EIR has addressed these issues by "Best Management Practices" assertions, without any actual site analysis of the adequacy on these steep slopes and large cut-and-fill actions. The Draft EIR is also weak in terms of the analysis of run-off impact to Bear Creek created by the extended period of construction. F4-21

The Draft EIR does not address the impact on neighboring properties of snow removal, onsite snow storage and hydrological changes. For example, what will be the impact of snow removal from Alpine Sierra Road on the downhill properties and John Scott Trail? F4-22

<u>Identification of Alternatives</u>

The Draft EIR does a poor job of meeting the CEQA requirements for identifying and analyzing alternatives. As described at the public Planning Commission meeting on October 26, 2017, Alternative A has essentially been ruled out but is left in the analysis, and the focus of the applicant is on Alternative B. Both alternatives have very similar impacts as identified in the Draft EIR.

CEQA requires identification of a real alternative to lessen the impacts.

Beyond Alternative A and B, the Draft EIR describes C1, C2 and D. C1 is no development.

The Draft EIR says that "… Alternative C2 assumes that the project site would be developed consistent with the existing zoning. This would result in a site design similar to Alternative A." If C2 is similar to A, which is the denser alternative, then C2 certainly doesn't limit the impacts. F4-23

The Draft EIR describes Alternative D as: "This alternative assumes that the project site would be developed with a reduced development that provides greater avoidance of impacts to sensitive resources. This alternative would be identical to Alternative B except that it would eliminate two road crossings of the unnamed seasonal drainage on the site and would eliminate Lots 6, 7 and 27. Alternative D would have a reduced development footprint compared to Alternative A and Alternative B." Beyond this, there is no analysis of the reduced impacts of Alternative D. F4-24

Perhaps a scaled back development that is focused in the Stanford Chalet area could be designed to lessen the impacts identified. For example, an alternative that focused only on the 20 dwellings proposed in the Western portion of Alternative A would reduce the visual impacts, length of the project and thus noise impacts, and snow removal impacts on downhill residents and John Scott Trail. Such a scaled back development would also lessen the traffic and fire evacuation risk, and the run-off into Bear Creek due to a shorter construction period and reduced construction footprint. F4-25

The EIR should be required to do a more thorough job of analyzing alternatives to lessen the impacts of this proposed development.

Project Objectives:

One of the project objectives is listed as:

- Provide large-lot single-family home sites to address the lack of supply of high-quality vacant home sites in the Alpine Meadows Valley.

There is ample opportunity to purchase older existing home sites in Alpine Meadows, tear down the cabin and build a high-quality home. Such an approach allows for the development of high-quality homes with much more limited disturbance to the natural environment of Alpine Meadows. F4-26

I appreciate your attention to these comments.

Sincerely,

Judy Bruner

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Response to Comment Letter F4

Judy Bruner
October 30, 2017

F4-1 The comment provides introductory remarks and states that the Draft EIR takes a piecemeal approach to evaluating impacts although several impacts are inter-related.

The comment does not specifically address the project's environmental effects. The format of the Draft EIR is consistent with the industry standard for CEQA compliance. No response is required.

F4-2 The comment states that the Draft EIR analysis of cumulative impacts should have included consideration of the White Wolf project, which is proposed on 460 acres located across Alpine Meadows Road from the Alpine Sierra Subdivision project site.

Please refer to Master Response 12 regarding the cumulative scenario.

F4-3 The comment states that the proposed project would contribute to significant cumulative impacts to the visual resources in the Alpine Meadows valley and views from the Five Lakes Trail.

Refer to Master Response 2 regarding the adequacy of the Draft EIR analysis of visual impacts. The comment is correct that the Draft EIR concludes a significant cumulative impact to visual resources in the area would occur in the cumulative setting (Draft EIR Chapter 15, Impact 15.1). However, the impact analysis goes on to state that with inclusion of the project specific mitigation measures, the project would not result in a considerable contribution to the cumulative impact and therefore the impact of the project is less than significant.

F4-4 The comment states that regardless of building materials, construction of all of the components of Alternative B would have a significant cumulative impact on views from the Five Lakes Trail and other viewpoints within Alpine Meadows valley.

Refer to Master Response 2 regarding the adequacy of the Draft EIR analysis of visual impacts. The visual simulation provided in Figure 5-4B demonstrates that when the requirements of the proposed Architecture Handbook (such as limits on building height and grading and requirements for use of particular building materials and colors) are implemented, the project would not result in a substantial change in the character of views from the Five Lakes Trail, thus the Draft EIR concludes that the project's contribution to cumulative visual impacts would be less than significant.

F4-5 The comment requests clarification of text in the Draft EIR stating that there would be a significant impact related to noise in the cumulative scenario but that the proposed project would not make a substantial contribution to that impact and questions the source of the cumulative impact.

As shown in Draft EIR Table 15-4 and discussed on pages 15-12 through 15-14, a cumulative noise impact was identified due to the project increase in the amount of traffic on State Route 89, which is expected to cause the ambient noise levels within 100 feet of that roadway to range between 66.1 and 66.6 decibels. The County's maximum allowable noise level for residential land uses is 60 decibels. The cumulative impact is significant because the noise levels adjacent State Route 89 would exceed this maximum. The Alpine Sierra Subdivision would not contribute to that impact because the volume of traffic generated by the project, approximately 277 daily trips under Alternative A and 243 daily trips under Alternative B, would not be sufficient to change the noise levels adjacent to State Route 89.

Table 15-4 also shows that noise levels adjacent to Alpine Meadows Road in the cumulative scenario are expected to reach between 60.0 and 60.9 decibels in winter and between 48 and 56.7 decibels in summer. The traffic generated by the proposed project would contribute up to 2.2 decibels to the summer noise levels and up to 0.2 decibels to winter noise levels. As these increases are lower than the significance criteria identified in Chapter 8, the project's contribution to cumulative noise levels is less than cumulatively considerable. Refer also to Master Response 6, Noise.

F4-6 The comment states that the cumulative impact of the proposed Gondola project, the Alpine Sierra project, the Stanford Chalet project, and the White Wolf project will impede peaceful enjoyment of public lands and that the County Planning Commission should not ignore this because one project will not make a considerable contribution to this cumulative impact.

Refer to Master Response 12 regarding the cumulative scenario and response to comment F4-5 regarding the noise level increases attributed to the proposed project. Given that the project-generated noise would be less than significant at the existing residences nearest to the project site and the Five Lakes Trail is considerably further away from the project site, it is not expected that the proposed project would generate sufficient noise to adversely affect the recreational values of the Five Lakes Trail.

F4-7 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20

years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources regarding the effect of Mitigation Measure 6.5a on construction activities and response to comment F3-9 regarding the potential effects of a lengthened construction period.

F4-8 The comment references the biological resources assessment (Appendix D of the Draft EIR) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources and response to comment E3-15.

F4-9 The comment states that long-term construction of the project site would result in significant impacts to noise, light pollution, and visual resources in the area. The comment states that the length of project construction is evident from the amount of infrastructure that must be constructed, the viable construction periods, and because at least three phases are proposed. The comment further asserts that the Draft EIR analysis of the impacts of the prolonged construction period is inadequate. The comment requests that the Draft EIR take into consideration the expected number of years of construction to build the road and bridges, prepare lots and infrastructure, and sell the lots and construct on the lots in order to determine impacts. The comment states that people are estimating that construction will take 15 to 20 years.

Please refer to Master Response 2, Visual Resources, Master Response 3, Biological Resources, and Master Response 6, Noise, regarding the visual impacts of construction, the effect of various biological resource mitigation measures on the construction schedule, and the noise effects associated with a lengthy construction schedule.

F4-10 The comment states that the Draft EIR fails to evaluate noise impacts of prolonged construction on the Bear Creek Association pond, which is heavily used during the summer by families. The comment asserts that all construction noise in the Alpine Valley is loud and echoes throughout the valley. The comment requests that estimates for noise levels during different conditions (different numbers of units per year under construction) be provided. The comment states that road and bridge construction activities will require very large equipment and requests that noise from these

activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F4-11 The comment quotes the Avalanche Hazard Report regarding potential climate changes and increased fire risk; the comment expresses concern regarding the single road in and out of the valley, especially if Alpine Meadows Road is blocked or State Route 89 is heavily congested.

Please refer to Master Response 5 regarding evacuation, Master Response 9 regarding fuel reduction and fire risk management, and Master Response 10 regarding the proposed shelter-in-place provisions.

F4-12 The comment questions the feasibility of using fire resistant building materials and a shelter-in-place strategy and the placement of the shelter-in-placer facility adjacent to the diesel storage tank. Finally, the comment states that fire-resistant building materials and a shelter in place facility will not prevent the loss of life during a large forest fire and that the Planning Commission should require the project to comply with the Placer County Zoning Ordinance.

Please refer to Master Response 9 regarding fire resistant building materials and Master Response 10 regarding the shelter-in-place provisions and response to comment F3-18.

F4-13 The comment states that new development should not allow fire pits.

Please refer to Master Response 9 regarding the requirements for fire pits as provided in the Architecture Handbook (Draft EIR Appendix B3) and the vegetation management requirements in the Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2).

F4-14 The comment identifies several concerns with the validity of the traffic impact analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, and that the documented intersection levels of service do not reflect the long travel times experienced in the region.

Please refer to Master Response 4, Traffic.

F4-15 The comment states that the Draft EIR failed to include the White Wolf project in its traffic impact analysis.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F4-16 The comment states that the Draft EIR failed to address the cumulative traffic impact on State Route 89 and its effect on emergency response time.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation.

F4-17 The comment states that the County's willingness to waive county standards does not recognize the dangerous impact of ice and snow on Alpine Meadows road and puts users of this road at risk.

The comment addresses the requested Design Exception to the County's standard intersection design requirements for the Road A connection to Alpine Meadows Road. As noted on Draft EIR page 7-17, the proposed design includes sufficient pavement tapers and would allow vehicles to enter and exit Road A without encroaching on other traffic lanes. Additionally, on pages 7-17 and 7-18, the Draft EIR finds that with implementation of Mitigation Measure 7.3a, the Road A connection to Alpine Meadows Road would include adequate sight distance in both directions to meet County requirements and ensure that vehicles entering Alpine Meadows Road would see an approaching vehicle. This would ensure an appropriate level of safety at this intersection.

F4-18 The comment states the conclusion that the intersection of Alpine Meadows Road and State Route 89 operates at level of service A and B is not accurate.

Please refer to Master Response 4, Traffic.

F4-19 The comment states that the conclusion that the project would add 1 second of delay to the intersection of Alpine Meadows Road and State Route 89 is unrealistic.

Please refer to Master Response 4, Traffic

F4-20 The comment questions how the County can determine that construction activities would have a less than significant impact on traffic when the construction management plan has not been designed.

Mitigation Measure 7.4c defines the performance standards that the Construction Management Plan must achieve. This includes requirements that delivery trucks cannot idle or stage within the public right-of-way and that construction workers park onsite. These requirements would ensure that construction traffic does not impede the

ability of emergency responders to use Alpine Meadows Road. It is also noted that construction equipment, such as bulldozers, excavators and water trucks would be staged onsite and would not be traveling on Alpine Meadows Road on a daily or regular basis.

F4-21 The comment states that the Draft EIR does not adequately address impacts to groundwater recharge, snow storage effects on offsite drainage patterns, run-off to Bear Creek, and the effects of an extended construction period because it does not provide site-specific analysis of Best Management Practices, the steep slopes within the project site, and the extent of grading needed to construct the project.

Please refer to Master Response 7, Water Quality and Hydrology and to Master Response 8, Snow Storage.

F4-22 The comment states the Draft EIR does not address the impact of snow removal, onsite snow storage, and hydrological changes on neighboring properties, particularly the potential effects to downhill properties and John Scott Trail.

Please refer to Master Response 7, Water Quality and Hydrology and to Master Response 8, Snow Storage.

F4-23 The comment states that the proposed project fails to meet the CEQA requirements for identifying and analyzing alternatives. The comment then states that CEQA requires identification of an alternative that will lessen impacts and if Alternative C2 is similar to Alternative A, it will not lessen impacts.

Please refer to Master Response 13, Alternatives and responses to comments E3-30, E3-31, and E3-34. Alternative C2 is included in the Draft EIR to meet the CEQA requirements to consider the "no project" alternative.

F4-24 The comment states that Alternative D is similar to Alternative A, and there is no analysis of the reduced impact of Alternative D.

Draft EIR Section 16.7.5 on pages 16-27 through 16-31 provides an analysis that compares the impacts of Alternative D to those of Alternative A and Alternative B. Please also refer to Master Response 13, Alternatives.

F4-25 The comment suggests an alternative that includes only the 20 dwellings proposed in the western portion of the project site, noting that this alternative would reduce impacts to visual resources, traffic, snow, noise, fire evacuation risk, and runoff into Bear Creek.

Please refer to Master Response 13, Alternatives.

F4-26 The comment states that there are other older existing home sites in Alpine Meadows that could be torn down to allow for construction of high-quality homes which would satisfy the project objective and result in more limited disturbance to the natural environment.

Please refer to Master Response 13, Alternatives and Master Response 14, Project Merits.

Comment Letter F5

Shirlee Herrington

From: david.taylor10@comcast.net
Sent: Monday, October 30, 2017 12:30 PM
To: Placer County Environmental Coordination Services
Subject: Fwd: Bear Creek Association -Alpine Sierra Development-Comments Needed

To whom it may concern,

I have been a resident of Bear Creek for 29 years and have studied the plans to build Alpine Sierra and fully support the project AS IS and think it will enhance the area with new people and perspectives and probably help property values and tax rolls. F5-1

Please accept this project without further delay and get it done!

Respectfully,

David Taylor
2038 Bear Creek Road
650 339 1476

From: "Bear Creek Association - Emily Fralick" <emilyf@gpeak.com>
To: "David Taylor" <david.taylor10@comcast.net>
Sent: Monday, October 30, 2017 11:42:25 AM
Subject: Bear Creek Association -Alpine Sierra Development-Comments Needed

Dear Bear Creek Association member:

The Alpine Sierra Committee has put together a sample letter you may use to comment on the Draft EIR for the Alpine Sierra Development. The sample letter is attached; please feel free to use the parts that resonate the most to you. (Traffic and fire safety were of interest to the Planning Commissioners at last week's meeting.) Comments need to be sent by Friday, November 3, 2017 at 5 pm to: cdraecs@placer.ca.gov
Thanks for taking time to comment on the Draft EIR.

The Alpine Sierra Committee

The Draft EIR may be found at:
https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/alpinesierrasubdivision

Response to Comment Letter F5

David Taylor
October 30, 2017

F5-1 This comment expresses support for the project.

The comment does not identify any deficiencies in the Draft EIR or address the project's environmental effects. No response is required.

Comment Letter F6

Shirlee Herrington

From: Billy Volkmann <wvolkmann@gmail.com>
Sent: Monday, October 30, 2017 12:06 PM
To: Placer County Environmental Coordination Services
Subject: RE: Bear Creek Association -Alpine Sierra Development-Comments Needed

Alpine Sierra Subdivision Development

Draft EIR Dated Sept 2017

Comments Due to Placer County November 3, 2017 by 5:00 p.m.

Placer County Community Development Resource Agency

Environmental Coordination Services

3091 County Center Drive, Suite 190

Auburn, CA 95603

cdraecs@placer.ca.gov

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I/we have the following concerns with the DEIR:

F6-1

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer.

The analysis also assumes that a majority of the houses will be "recreational homes," which have "relatively low" traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

F6-1 Cont.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR.

F6-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions.

F6-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year.

F6-4

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F6-5

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F6-6

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F6-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F6-8

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality.
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

F6-9

This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level.

F6-10

Defensible Space

How is it possible to due defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance?

F6-11

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

F6-12

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F6-13

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of of potential impacts and mitigation measures? Do they recommend more study? F6-14

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F6-15

I/we hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Billy Volkmann

1923 Cub Lane.

Alpine Meadows, CA

Response to Comment Letter F6

Billy Volkmann
October 30, 2017

F6-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, the lack of consideration of the potential for recreation homes to be occupied by large groups of people, and the lack of consideration of the Village at Squaw Valley Specific Plan and White Wolf projects in the cumulative analysis.

Please refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis.

F6-2 The comment states that the analysis of emergency response and evacuation should consider the effects of cumulative development in the region.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F6-3 The comment states that the Draft EIR does not address the White Wolf project proposed project which would access Alpine Meadows Road within 160 feet of the ingress/egress for Alpine Sierra and the associated roadway level of service and safety during snow and icy conditions.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F6-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in

Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F6-5 The comment expresses concern regarding the requirement in Mitigation Measure 7.3a to remove snow from the corner of the project entrance and Alpine Meadows Road during a big snow year.

Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

F6-6 The comment questions if the County has performed a feasibility study regarding using fire resistant building materials and the proposed shelter-in-place strategy.

Please refer to Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F6-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that the Draft EIR does not consider how climate change may alter avalanche hazards.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F6-8 The comment expresses concern that snow removal on the slope below Road A could cause avalanches onto John Scott Trail.

Please refer to Master Response 11, Avalanche Hazards.

F6-9 The comment states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F6-10 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivisions.

F6-11 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F6-12 The comment asserts that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period and does not reflect the degree to which construction noise echoes through the valley. The comment inquires as to how mitigation measures will be enforced to ensure that noise levels are not significant, and states that construction activities should not be exempt from noise thresholds when those activities may occur over multiple years. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided and that the construction noise analysis consider the effects of the use of large equipment to construct roads and bridges, and requests that noise from these construction activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F6-13 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F6-14 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F6-15 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality, regarding the potential changes in drainage due to vegetation removal.

Comment Letter F7

Shirlee Herrington

From: David Anhalt <david.anhalt@gmail.com>
Sent: Tuesday, October 31, 2017 2:53 PM
To: Placer County Environmental Coordination Services
Subject: Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I have the following concerns with the DEIR:

Traffic Analyses
Traffic Survey
The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F7-1

The analysis also assumes that a majority of the houses will be "recreational homes," which have "relatively low" traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts
The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Y in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F7-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F7-3

Emergency Response
The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An F7-4

additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F7-4 Cont.

Snow Removal
In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F7-5

Hazards
"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F7-6

Fire
Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche
Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F7-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F7-8

Visual impacts
During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:
The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
Roadways themselves are much darker and less reflective than they would be in reality.
The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
There are no cars or other bright and shiny objects in the view.
Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape. F7-9
This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be F7-10

prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level. F7-10 Cont.

Biological resources
Special-status Species
The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described. F7-11

The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is not development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter. F7-12

Fish
We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F7-13

Defensible Space
How is it possible to do defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F7-14

Noise
The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years. F7-15

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F7-16

Hydrology
Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F7-17

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F7-18

I hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

David Anhalt
1072 Snow Crest Rd
Alpine Meadows

Response to Comment Letter F7

David Anhalt
October 31, 2017

F7-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F7-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F7-3 The comment states that the Draft EIR does not address the White Wolf project which would access Alpine Meadows Road within 160 feet of the ingress/egress for Alpine Sierra and the associated roadway level of service and safety during snow and icy conditions.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study, Master Response 12 regarding the validity of the cumulative impacts analysis, and response to comment F6-3 regarding intersection spacing.

F7-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F7-5 The comment identifies concern with Mitigation Measure 7.3a, which requires snow removal at the project site entrance.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

F7-6 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter in Place strategy.

F7-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that these factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements. The comment states that the Draft EIR does not provide any analysis of how these changes would affect the project, including access to the project site. As this comment is provided below the heading "avalanche," it is understood that the comment identifies a concern that future avalanche hazards could differ from what is evaluated in the Draft EIR.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F7-8 The comment identifies concern that the snow removal and storage on the slope below Road A could cause avalanches onto John Scott Trail because proposed Road A cuts across an avalanche path. The comment notes that John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadow Road is closed due to avalanches.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazard.

F7-9 The comment states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F7-10 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivision.

F7-11 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources regarding the effect of Mitigation Measure 6.5a on construction activities and response to comment F3-9 regarding the potential effects of a lengthened construction period.

F7-12 The comment references the biological resources assessment (Draft EIR Appendix D) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources.

F7-13 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site,

regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F7-14 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3 regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F7-15 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires as to how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F7-16 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be

provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F7-17 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F7-18 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

Comment Letter F8

Shirlee Herrington

From: Jerry Cahill <jcahill@calfox.com>
Sent: Tuesday, October 31, 2017 12:06 PM
To: Placer County Environmental Coordination Services
Subject: Alpine Sierra EIR comments

My wife and I own a cabin at 1783 Deer Park Drive in Alpine Meadows.
After reviewing the EIR we recommend that Placer County approve **Alternative B** which better addresses density and environmental concerns. F8-1
We remain skeptical that the construction requirements for traffic, noise, dust are unenforceable. Please do not burden other residents with enforcement. F8-2
We are also skeptical that the "trail" will be used to access the ski resort. The homes are too far away and they will drive unless there is a van service to the area. F8-3

Jerry Cahill
Calfox, Inc.
300 Drake's Landing Road, #207
Greenbrae, CA 94904
Direct tel 415-464-3664
Fax 415-464-3678

Response to Comment Letter F8

Jerry Cahill
October 31, 2017

F8-1 The commenter recommends Alternative B, which better addresses density and environmental concerns.

The comment does not identify inadequacies or inaccuracies in the Draft EIR. No response is required.

F8-2 The commenter expresses skepticism that the construction requirements for traffic, noise, dust are enforceable.

The project applicant and all construction contractors are required by law to follow all federal, state, and local requirements and policies as well as to implement the mitigation measures listed in the Draft EIR and the Mitigation Monitoring and Reporting Program. The County would have the responsibility of enforcement of the mitigation measures. Please refer to the Mitigation Measures section within Master Response 2, Visual Resources, for a discussion of how some mitigation measures are implemented with notes included on the Improvement Plans.

F8-3 The comment expresses skepticism that the trail between the proposed project and the ski resort would be used because the homes are too far away from the ski area.

Please refer to Master Response 14, Project Merits.

Comment Letter F9

Donald L. Jones
2030 Park Drive, Alpine Meadows

October 31, 2017

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

Re: My Thoughts on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch,

I am not by nature a "not in my backyard" neighbor, but I would hope that the County will or has been thorough in making certain that the various DEIR issues under consideration are not only up to date but include or anticipate the other projects in the pipeline.

I think from a traffic, fire, and avalanche standpoint, at minimum – with (i) Alpine Meadows Road being the sole access road into the area; (ii) with, to my understanding, there only being one road into and out of the subject project; and (iii) with there already probably being too many homes, together with a ski resort, for the infrastructure available – one has to be concerned that the existing roadways will be able to handle a catastrophe like a major fire starting down at the bottom and fueling its way up Alpine Meadows. I lived through the Oakland Hills fire where people couldn't get out because roads were blocked by too many trying to escape. F9-1

But thank you for your work to date. I appreciate that it is not an easy job.

Sincerely,

Donald L. Jones

Response to Comment Letter F9

Donald L. Jones
October 31, 2017

F9-1 The comment expresses concerns that the proposed project will have an impact with regards to traffic, fire, and avalanche because there is only one road in/out of the project site, only one road in/out of the whole area, and too much traffic (associated with the ski area and the existing and proposed residences) for the existing infrastructure.

Please refer to Master Response 4 regarding traffic, Master Response 5 regarding emergency response and evacuation, Master Response 9 regarding fuel management and fire safety, and Master Response 11 regarding avalanche hazards.

Comment Letter F10

Shirlee Herrington

From: Sharla Menlove Chador <menlovechador@gmail.com>
Sent: Tuesday, October 31, 2017 9:32 AM
To: Placer County Environmental Coordination Services
Subject: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F10-1

The analysis also assumes that a majority of the houses will be “recreational homes,” which have “relatively low” traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F10-2

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F10-3

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F10-4

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F10-5

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F10-6

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality.
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

F10-7

This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level.

F10-8

Biological resources

Special-status Species

The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

F10-9

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a,

when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described. F10-9 Cont.

The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is **not** development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter. F10-10

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F10-11

Defensible Space

How is it possible to due defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F10-12

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F10-13

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F10-14

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F10-15

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F10-16

I hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Sharla Menlove Chador
(
Alpine Meadows full-time resident
)

Managing Director

ENGEL & VÖLKERS Truckee • Lake Tahoe
Licensee of Engel & Völkers U.S. Holdings, Inc.

Mobile: 707-292-0929
Mailto: sharla.menlovechador@evusa.com
BRE# 01953130

This e-mail and any attachments are confidential. If you are not the inter
this e-mail, please immediately delete its contents and notify us. This em
for virus contamination before being sent - nevertheless, it is advisable t
contamination occurring during transmission. We cannot accept any liabi
contamination.

Response to Comment Letter F10

Sharla Menlove Chador
October 31, 2017

F10-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people.

Please refer to Master Response 4 regarding the methodology and validity of the traffic impact study.

F10-2 The comment identifies concerns that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F10-3 The comment identifies concern about the snow removal at the project site entrance required under Mitigation Measure 7.3a in a heavy snow year.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

F10-4 The comment references Draft EIR text stating that because the project does not include two points of access, as is required under the Placer County Zoning Ordinance, other project modifications would be made to ensure safety. The comment summarizes that these modifications including use of fire resistant building materials and providing a Shelter in Place facility onsite. The comment questions the efficacy of these measures.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter-in-Place facilities.

F10-5 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that these factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements. The comment states that the Draft EIR does not provide any analysis of how these changes would affect the project, including access to the project site. As this comment is provided below the heading "avalanche," it is understood that the comment identifies a concern that future avalanche hazards could differ from what is evaluated in the Draft EIR.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F10-6 The comment identifies concern that the snow removal and storage on the slope below Road A could cause avalanches onto John Scott Trail because proposed Road A cuts across an avalanche path. The comment notes that John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadow Road is closed due to avalanches.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazards.

F10-7 The comment notes that visual impacts were raised as a topic of concern in the Notice of Preparation comments and states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F10-8 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivision.

F10-9 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Please refer to Master Response 3, Biological Resources, regarding the effect of Mitigation Measure 6.5a on construction activities and response to comment F3-9 regarding the potential effects of a lengthened construction period.

F10-10 The comment references the biological resources assessment (Draft EIR Appendix D) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources.

F10-11 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F10-12 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F10-13 The comment asserts that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the

project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires as to how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F10-14 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F10-15 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to

water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F10-16 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

Comment Letter F11

Shirlee Herrington

From: Keri Tully <keritully@gmail.com>
Sent: Tuesday, October 31, 2017 12:12 PM
To: Placer County Environmental Coordination Services
Subject: RE: Bear Creek Association -Alpine Sierra Development-Comments Needed

Placer County Community Development Resource Agency

Environmental Coordination Services

3091 County Center Drive, Suite 190

Auburn, CA 95603

cdraecs@placer.ca.gov

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I/we have the following concerns with the DEIR:

Traffic Analyses F11-1

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer.

The analysis also assumes that a majority of the houses will be “recreational homes,” which have “relatively low” traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account. F11-1 Cont.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F11-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160’ of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600’ which already experiences (periodic) LOS F conditions. F11-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F11-4

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F11-5

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F11-6

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F11-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F11-8

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways: F11-9

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality.
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.

- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

F11-9 Cont.

This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level.

F11-10

Biological resources

Special-status Species

The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described.

F11-11

The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is **not** development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter.

F11-12

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River.

F11-13

Defensible Space

How is it possible to do defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F11-14

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F11-15

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F11-16

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each home site for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of storm water generated by individual home sites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F11-17

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F11-18

I hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region. F11-18 Cont.

Sincerely,

Keri Tully

2362 John Scott Trail, Alpine Meadows

Response to Comment Letter F11

Keri Tully
October 31, 2017

F11-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F11-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F11-3 The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F11-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 80 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F11-5 The comment identifies concern with Mitigation Measure 7.3a, which requires snow removal at the project site entrance.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

F11-6 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter-in-Place facilities.

F11-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that these factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements. The comment states that the Draft EIR does not provide any analysis of how these changes would affect the project, including access to the project site. As this comment is provided below the heading "avalanche," it is understood that the comment identifies a concern that future avalanche hazards could differ from what is evaluated in the Draft EIR.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F11-8 The comment identifies concern that the snow removal and storage on the slope below Road A could cause avalanches onto John Scott Trail because proposed Road A cuts across an avalanche path. The comment notes that John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadow Road is closed due to avalanches.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazards.

F11-9 The comment states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F11-10 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivision.

F11-11 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources, regarding the effect of Mitigation Measure 6.5a on construction activities and response to comment F3-9 regarding the potential effects of a lengthened construction period.

F11-12 The comment references the biological resources assessment (Draft EIR Appendix D) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources.

F11-13 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F11-14 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F11-15 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires as to how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F11-16 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F11-17 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F11-18 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

Comment Letter F12

Date: November 1, 2017

To: Placer County Community Resource Agency
By email to cdraecs@placer.ca.gov Attn: Shirlee I. Herrington

From: Robert H. Cole
2569 Upper Bench Road, Alpine Meadows; 2959 Piedmont Ave. Berkeley CA 94705

Re: Comments on Draft EIR for Alpine Sierra Subdivision dated 9/19/17

Introduction

These comments are submitted by my wife and myself as long-time, involved members of the Alpine Meadows community. We have had a cabin in the Alpine Meadows Estates Subdivision for over 20 years that directly abuts the Forest Service land at risk here; we have a second cabin across the street for our adult children. Our properties and our enjoyment of the forest and the trail through it will certainly be adversely affected by the proposed Alpine Sierra Subdivision, but we write mainly in our capacity as citizens deeply concerned to protect the environment in our valley. I hasten to add that I am not in any way expert in environmental matters; I write as an amateur who is however somewhat knowledgeable about the Alpine Meadows valley. I trust you will forgive the professional shortcomings in my comments.

To begin with, I want to express admiration and gratitude for the thorough, fair-minded, and hard work that has gone into this impressive Draft EIR. The concerns and differences I have with it in what follows in no way diminish my sincere respect and appreciation for the work you have done and the highly professional document you have produced.

F12-1

In a nutshell, the most central of the concerns in these comments (in points 2, 3, & 4 below) is that Alpine Sierra is a high risk proposal that demands the utmost caution from the County. The proposed subdivision would devastate a large, more or less untouched forest, with highly speculative consequences for all aspects of nature in and around it, for the surrounding community, and indeed for the economic viability of the project itself. To cope with this, the DEIR proposes what seems like dozens of mitigating measures, many of which seem far from routine, but it does this in a piecemeal, disaggregating way. A more aggregating, cumulative, holistic analysis of total risks is also required.

F12-2

Under such an analysis – and I think under any risk-conscious analysis at all – nothing more than Alternative D – the 'Environmentally Constrained Alternative" – can be permitted. In fact, I believe we require an "Alternative E": only the western portion of Alternative D can be permitted at this time. Under any alternative other than "E," the worst case scenario is that the project will not be viable and some 33 ghostly acres will lie barren in the eastern section, deforested, paved with unused roads, covered with empty lots, perhaps with a forlorn demonstrator house – all a total waste, and harmful to the neighboring communities. A nearby project, Alpine Knolls, has not materialized, and this worst case scenario is a far from improbable one. F12-3

All of our concerns will now be spelled out.

<u>1. The DEIR seems to contradict itself as to the existence of "substantial and unavoidable impacts." If there are such impacts, a revised DEIR is necessary to evaluate the project in light of those impacts.</u>

Section 2.9 of the Executive Summary states:
"Although mitigation measures have been identified to reduce impacts to the extent feasible, the project would result in six significant and unavoidable impacts."

On the other hand, Section 16.3 in the CEQA Considerations chapter states: "There are no significant and unavoidable impacts." F12-4

I confess to not understanding this apparent self-contradiction. I did not see any "significant and unavoidable impacts" listed in the tables or discussions, but perhaps I missed them. Or perhaps I misunderstand what seems like a clear statement in Chapter 2 that there are six such impacts. If there are such impacts, a revised DEIR discussing their bearing on the project seems necessary.

<u>2. The numerous and wide range of risks created by the proposed project need to be evaluated in a more aggregated manner, beyond piecemeal, limited mitigating measures.</u>

There are several ways in which the risks of this project escape the DEIR's approach. For example, the DEIR identifies a large set of environmental hazards, which reflects the risky character of this project. The DEIR then proposes a very large set of mitigation measures; each hazard has its set of one and often more mitigation measures. This approach seems to assume that each environmental F12-5

hazard is an independent problem subject to a discrete, independent solution. But I would think when we are dealing with eco-systems that the whole is greater than its parts. Thus, it seems to this amateur that the total number of problems needing mitigation and the large number of supposed fixes may put the whole eco-system over the tipping point. F12-5 Cont.

Similarly, mitigating on a piecemeal basis seems to assume that the effects of the project end at its boundaries. But the gross displacement of every form of animal and plant life and of land use must have ecological consequences to the surrounding land. I would think these risks need to be identified and evaluated. F12-6

Again, some mitigation measures seem to me overly precise. For instance, it seems unduly optimistic to think that protecting the threatened yellow warbler for just the few weeks of its expected nesting period, or the long legged myotis bat for its roosting period, is enough. There must be countless other cutoffs like this; mitigations by definition have specific limits. Yet there have to be allowances for margins of error, and I don't see in the DEIR a methodology for making and aggregating them. F12-7

Another example is the DEIR's required discussion of the cumulative impact of projects in the area. I don't see a suggestion of how to evaluate these in the aggregate. Alpine Sierra may not add much to the outsize Squaw Valley project that has been approved; but don't we arrive at a breaking point at some point, and, again, don't we have to allow for margins of error in the large number of developments going on in the immediate region? If no one development ever is too much, and we only consider one development at a time, we will never find a development too burdensome but will find ourselves one day overwhelmed. F12-8

Then, too, we should consider how these projects are squeezing existing land uses. To take an example that affects us personally, the DEIR does not mention the Alpine Knolls Subdivision, which was approved some years ago but has never moved forward; perhaps it's not mentioned because its authority has elapsed, but there is no reason to think it won't reappear. The area in which we have our cabins, the Alpine Meadows Estates Subdivision, would be adversely squeezed in both predictable traffic and pollution and unpredictable eco-system pressures at both its western and eastern boundaries if Alpine Sierra and Alpine Knolls were both to go forward. Such converging effects need to be considered. There must be many examples like this. F12-9

Also, of course, are such safety concerns as fire, avalanche, emergency vehicle access, and residents' escape routes. Doubtless, other neighbors will comment on the adequacy of the mitigation measures. I would only add that, in these matters of human life, it seems obvious that the margins of error for safety in the DEIR must be generous and explained, and that some kind of aggregation of risks beyond isolated mitigations should be made. Many close calls combined is too many. F12-10

3. In addition to mitigations, a more aggregated and prudent approach to the set of environmental risks is required for a proposed Subdivision that radically and irreversibly would change a forest into a suburb.

Approval of this proposed Subdivision is inescapably a matter of judgment. Inescapably essential to that judgment is how you speculate about the risks the proposal creates. You can call the doubts in favor of the development or you can call them in favor of the environment; you have to call them one way or another – whether you do so self-consciously or implicitly. The DEIR is entirely professional and neutral on its face, but its entire reliance on limited mitigation measures implicitly calls the doubts in favor of development: Do these very specific, limited things, and the project's fine. But in the situation of this proposal, that is not prudent. F12-11

As I tried to say in the last section, reliance on specific mitigation measures alone is too likely to mistake the parts for the whole. There needs to be a greater and explicit allowance for error, cumulated impacts, a tipping point. Making this allowance requires a cautious approach to speculation, calling the doubts in favor of the environment, both natural and built.

This is crucial in the present case because, as the DEIR says in the CEQA chapter, this Subdivision would change 33 acres of forest into a suburb. The change is radical and irreversible. Our children and grandchildren, and beyond, are stuck with it. As I said in the Introduction, the worst case result of our mistakenly calling the doubts will be a barren 33 acres of former forest, riddled with unused roads and overgrown empty lots. Our grandchildren would not deserve that . F12-12

4. Of the options explored in the DEIR only Alternative D meets the requirements of prudent judgment , and it would be much wiser still to limit approval at this time only to the western portion of Alternative D. F12-13

Alternative D is the "Environmentally Constrained Alternative." It is the one alternative tailor-made for prudent speculation about the risky effects of this proposal. I take it that the DEIR does not explore it at length because it is enough to state, as the DEIR does, its differences from Alternative B, which makes obvious its environmental advantages over Alternative B. In my judgment, in the circumstances as I see them, permitting development beyond Alternative D would be irrational. F12-13 Cont.

But there is more to consider. There are obvious economic risks that some 28 high-end houses in their proposed location will not sell. In the best of circumstances, selling that number of high-end lots and building on them could go on for a decade, so we are talking about a highly speculative long run. Given all the other risks, as I see them, the prudent thing to do is to move incrementally here. The western portion of Alternative D could be approved at this time but not the eastern portion. Call this "Alternative E." Perhaps this may be financially undesirable for the developer, who might find it more efficient to do all of the infrastructure at once, but under the language quoted of CEQA and as a manner of rational administration, it seems a justifiable cost to impose. All mitigation measures, and the requirement of an EIR at all, impose costs; that is part of the system. The western portion of Alternative D presents a minimum of safety concerns; it is very close to the Alpine Meadows Road and the ski resort; in that way, it is essentially in an already developed area; it is a relatively compact area with relatively limited environmental impacts; it will provide good evidence of the economic potential of the rest of the proposed Subdivision and, indeed, perhaps of the environmental effects of the eastern portion. F12-14

I am not suggesting that the County substitute its financial judgment for the developer's, but any realistic analysis requires a judgment that a project is feasible. This Alternative E may be an unusual approach, but the portions of CEQA quoted in the DEIR support the County's authority to approve only the western portion of Alternative D at this time. I strongly urge this solution.

<u>5. The importance and preservation of the hiking trail through the proposed Subdivision do not seem to be considered in the DEIR, and some kind of supplement to the DEIR to address it seems necessary.</u>

F12-15

Extending from the Forest Service land to the east of the proposed Subdivision and running through the forest which the Subdivision would convert to suburb is a unique and lovely hiking trail. It is easily accessible to the public, relatively undemanding of hikers in terms of both vertical climb and distance,

remarkably varied for such a short trail with many lovely views, dense forest, stately stands of large trees, a rocky moonscape, flower-filled meadows, lush streams. It is, truly, a unique asset.

The DEIR seems to include only one sentence about it, in the Executive Summary, Chapter 2.2: "There is an existing U.S. Department of Agriculture Forest Service (USFS) trail easement that meanders through the eastern portion of the site." This is certainly not all there is to say, and maybe I have missed something. But so far as I have seen, puzzling as it is, the DEIR does not seem to discuss the trail.

To begin with, there is its legal status. I would not think it is simply an easement in favor the Forest Service. I'm no expert on this, but I would have thought this is an easement in favor of the public. I don't see how the Forest Service would get into this private land. In any event, the public has been openly using this trail for decades as of right throughout its length in the proposed Subdivision. Our family itself has been using it as of right for over 20 years, and the trail was obviously long established when we came. I would imagine it certainly goes back at least to the 1960s, if not long before then.

If this trail is an easement in favor of the public, I would think it cannot simply be extinguished as is, relocated, turned basically into an unpaved suburban sidewalk – all at the whim of a developer to suit its suburban plans. I would think it would have to be preserved – after all, it is an easement. But perhaps changes are legally allowed subject to demanding mitigations to preserve something like its present quality; I don't claim to know. F12-15 Cont.

But what I think I do know is that this trail is really special, a remarkable little treasure, and that its legal status as an easement in favor of the public needs to be determined and explained in an EIR. Once its legal status is discussed, its environmental protection against impacts – which would be devastating here – and the justifiability of mitigation measures must be discussed and considered. This trail is a genuinely important community asset, environmentally and recreationally. It needs to be taken very seriously in the DEIR.

<u>Conclusion</u>

These comments are longer than any of us wanted. I am very grateful to you for seriously considering them. Respectfully yours, Robert Cole

Response to Comment Letter F12

Robert H. Cole
November 1, 2017

F12-1 This comment provides introductory remarks identifying the commenters as long-time members of the Alpine Meadows community.

The comment does not question the accuracy or adequacy of the Draft EIR or address the environmental effects of the proposed project. No response is required.

F12-2 The comment states that the proposed project would destroy a relatively untouched forest, which would have environmental consequences. The comment states that the EIR mitigation measures address the project's effects in a piecemealed way and a more aggregating, cumulative, holistic analysis of total risks is required.

The Draft EIR was completed in accordance with the CEQA guidelines. The evaluation of impacts and development of mitigation measures on a resource-by-resource approach is the industry standard for CEQA compliance. Where mitigation measures address more than one resource, they are reiterated in the appropriate chapters.

F12-3 The comment states that only Alternative D should be allowed. The commenter suggests an Alternative E, in which only the western portion of Alternative D is permitted, as it is possible that the project will not be viable as was the case with Alpine Knolls, and this would result in 33 acres in the eastern portion of the site lying barren, deforested, and paved with unused roads.

Please refer to Master Response 13 for a discussion of project alternatives. The project is proposed to be developed in phases, with development of the western portion of the site in Phase A. The Alternative A project does not propose to construct all of the backbone infrastructure and roads in the eastern portion of the site until Phases B, C and D (Phases B and C in the case of Alternative B, the applicant's preferred project).

F12-4 The comment states that the Draft EIR contradicts itself by stating that there are 6 significant and unavoidable impacts in Section 2.9 but nowhere else does the Draft EIR mention a significant and unavoidable impact.

This was an error in the Draft EIR. Section 2.9 has been revised to state that there are no significant and unavoidable impacts as discussed in Chapters 4 through 16.

F12-5 The comment states that the mitigation measures address the project's environmental hazards individually and that this approach assumes that each impact is an independent problem. The comment suggests that the total number of problems which need mitigation and the large number of mitigation measures may put the whole eco-system over the tipping point.

As discussed in response to comment F12-2, the approach used in the Draft EIR is the industry standard for CEQA compliance. The mitigation measures are designed to directly address specific effects. For example, the special-status species yellow warbler could be adversely affected if construction activities disturb an active nest. Mitigation Measure 6.5a provides a specific response to this potential impact. Mitigation measures are necessarily targeted to a particular impact to ensure that the mitigation is effective at addressing the specific resource needs. The analysis in the Draft EIR demonstrates that with implementation of mitigation measures, there would be no significant and unavoidable impacts. Thus, the project would not put the ecosystem over the tipping point.

F12-6 The comment states that the piecemeal approach assumes that the impacts end at the projects boundaries. The commenter then states that the gross displacement of biological resources would have ecological consequences to the surrounding land.

The Draft EIR analyzed the scale of the proposed project's impacts as appropriate and as outlined by the CEQA guidelines and case law. As stated in Master Response 3, Biological Resources, the analysis of potential effects to special-status species considered the adjacent Tahoe National Forest lands as well as all other habitats in the project vicinity.

F12-7 The commenter states that some mitigation measures are overly precise – for example protecting the yellow warbler and long-legged myotis bat only during nesting/roosting seasons – and that the Draft EIR should make allowances for a margin of error.

As stated on Draft EIR page 6-16, "The very small proportion of riparian vegetation that would be lost as a result of the project is considered to be a less-than-significant impact on yellow warbler because sufficient riparian vegetation would remain on-site to support local populations of this species." Further, the Draft EIR identifies that a significant impact to this species would occur only if active nests are disturbed during construction because this could lead to nest abandonment. Thus it is appropriate for Mitigation Measure 6.5a to limit protection for this species to the nesting season.

F12-8 The comment states that the Draft EIR does not evaluate the aggregate of cumulative impacts, along with a margin of error, to ensure that the region does not reach a breaking point.

The cumulative impacts analysis provided in Draft EIR chapter 15 meets the applicable CEQA requirements. It identifies the geographic range in which cumulative impacts could occur and the other projects in the region that could contribute to those impacts. It then evaluates the impacts under the cumulative development scenario and determines whether the proposed project would make a considerable contribution to those impacts.

F12-9 The comment states that the Draft EIR does not include Alpine Knolls; the commenter expresses concern that Alpine Meadows Estates Subdivision would be adversely affected by predictable traffic and pollution and unpredictable ecosystem pressures at both its western and eastern boundaries if both Alpine Knolls and Alpine Sierra are developed.

Please refer to Master Response 4, Traffic, regarding the approach to the cumulative traffic impacts analysis and to Master Response 12, Cumulative Scenario, regarding the reasonably foreseeable projects included in the cumulative impacts analysis.

F12-10 The comment states that, as there are safety fire, avalanche, emergency vehicle access, and residents' escape routes, the margins of error for safety must be generous and explained and some kind of aggregation of risks beyond isolated mitigations should be made.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 10, Shelter-in-Place, and Master Response 11, Avalanche Hazards.

F12-11 The comment states that when there is a doubt, the judgement should fall in favor of the natural and built environment instead of the developer and that the Draft EIR's reliance on limited mitigation measures implicitly calls the doubts in favor of the developer.

As discussed in response to comment F12-2, the approach used in the Draft EIR is the industry standard for CEQA compliance. The mitigation measures are designed to directly address specific effects. Additionally, the determination of whether an impact would be significant or less than significant is based on the detailed significance criteria defined in each chapter of the Draft EIR. The significance criteria were developed based on the CEQA Guidelines and County policies and standards.

F12-12 The comment states that reliance on specific mitigation measures is likely to mistake parts for the whole and does not provide any allowance for error or cumulative impacts.

Please refer to responses to comments F12-7 and F12-8 regarding the standard approach to preparing an EIR and developing mitigation measures. Please also refer to Master Response 12, Cumulative Scenario.

F12-13 The comment states that only Alternative D meets the requirements of prudent judgment and approving any development beyond it is irrational.

The comment does not question the accuracy or adequacy of the Draft EIR. Please refer to Master Response 13, Alternatives.

F12-14 The comment states that it is possible that the high-end homes will not sell and that it could take 10 years for the project to be fully built out. The comment states that only the western end of Alternative D should be developed because it presents a minimum of safety concerns, is essentially in an already developed area, is a relatively compact area with relatively limited environmental impacts, and will provide good evidence of the economic potential of the rest of the proposed subdivision and the environmental effects of the eastern portion.

The comment does not question the accuracy or adequacy of the Draft EIR. Please refer to Master Response 13, Alternatives, and response to comment F12-3 which notes that the project is proposed to be constructed in phases.

F12-15 The comment states that the importance and preservation of the existing hiking trail on the project site is not considered in the Draft EIR. The comment describes the trail and requests additional information regarding the legal process for and environmental effects of relocating the trail easement.

Please refer to Master Response 1, Existing and Proposed Trail.

November 1, 2017

Shirlee Herrington
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Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Shirlee:

The Draft EIR for the Alpine Sierra Subdivision Project appears to fall short of Placer County's obligations under the California Environmental Quality Act. As with other recent EIR's produced by Placer County, this document uses outdated information (traffic surveys), weak analyses (fire hazards, emergency response), omissions of substantial cumulative impacts (Squaw Village, White Wolf, gondola) and (it appears) unsubstantiated conclusions (emergency response ingress/egress, public safety). It is frustrating to read a document intended to inform the public that in fact portrays inaccurate road and traffic conditions that the project will further degrade. F13-1

The EIR would benefit from a summary discussion of Placer County's understanding of it's Public Trust responsibilities regarding the protection of the public interest regarding community health and safety. I ask the county to clarify for the public it's government responsibilities to ensure the protection of public health, safety and environmental protections, of both the Alpine Meadows community and the broader North Lake Tahoe environs. Endless citations of state and federal laws tend to obscure what in fact the county believes (and practices) regarding its government role in serving the public, above the individual. F13-2

CEQA Scoping
Though the DEIR asserts (pg 1-3) there were no "new" information received subsequent to the 2014 NOP, Placer County in fact has received formal applications and undertook administrative and substantive processing of the Squaw Village development proposal, the Squaw/Alpine F13-3

Gondola proposal, the “Standford” Chalet and the White Wolf Development proposal. Each of these proposals would have, if developed, direct and indirect impacts on the Alpine Sierra Development, as well as significant cumulative impacts on the homeowners throughout Alpine Meadows. The purpose of CEQA scoping is clear and the public has articulated to Placer County the growing concerns of the inadequacy of our transportation (existing Level of Service F conditions), the continuing decline of our environment (non-compliance of Truckee River water quality), the on-going crises of affordable housing and the growing risks to public safety (California now in unprecedented fire hazard conditions). Yet the county evaluates this project as if it is December, 2010. How can the county account for, or justify, not fully disclosing to the public in this EIR the complete context of multiple pending developments that will span 25 years of construction that without doubt would cause exponential changes in infrastructure, environmental and social conditions? Please explain to us the criteria the county is using to determine what will be disclosed to the public and what the county chooses not to disclose to the public. And, importantly, how this aligns with public interest and the Public Trust responsibilities of our local (county) government? F13-3 Cont.

Scoping Comments

Comments of significant importance to homeowners in Alpine Meadows and to the natural resources of the area that were submitted to Placer County appear to be missing in this DEIR. Specifically these issues include: F13-4

- Traffic patterns and safety at the project access to AM Road, given White Wolf proposed 155 parking spaces with one ingress/egress within 160 feet of Alpine Sierra’s one ingress/egress.
- Forest fire risks and response is a major issue to our community yet the mitigation (a new fire truck) and overall plan seem trite when we reflect on the overwhelmed and inadequate fire planning and resources evidenced in the Mendocino, Sonoma and Napa County fires. Please describe for us how Placer County may be different (ie safer) in it’s fire preparedness, emergency response capacities and fire fighting resources than what was just experienced in those three counties. Should not the county now demand a thorough review of all fire preparedness conditions and capacities so eastern Placer County does not find itself completely overwhelmed as other counties have just experienced? F13-5

- Snow removal, onsite snow storage, hydrological changes to neighboring properties. The snow storage and removal plan does not appear to adequately account for the snow conditions of this last winter, why weren't those conditions specifically used for impact assessments? F13-6
- Emergency vehicle ingress/egress especially during Level F conditions (an existing condition during certain winter weekends and summer times, this year on AM Road, Hiway 89 intersection, and Hiway 89-Truckee and Hiway 89-Tahoe City). F13-7

The request for updated traffic analyses (versus outdated and technically deceptive traffic survey data) was ignored. The county's decision to use this inappropriate data has already caused citizen's to raise private funds to force remedy of the county through the courts. Is that in the public interest? Why did the county choose not to update it's traffic information and attempt to satisfy minimum professional engineering standards for traffic safety analyses, even after legally challenged on the same CEQA (and technical) failing? F13-8

The visual impacts to Five Lakes Trail was identified as a significant issue by the public. The trail is likely the most popular and heavily used trail in Northern Calif, the most popular trail in Placer County. Yet the analysis is weak and deceiving. The visual rendition of what the development would look like from the Five Lakes Trail appears to minimize any potential visual impact. The simulation is not convincing and the county would do well to undertake a second independent visual simulation of the build-out from the prominent view point on Five Lakes Trail. Why would the county not undertake a second review of such an important natural resource asset? F13-9

Water resource impacts were identified as potentially significant in scoping comments, including groundwater recharge (which does occur on site), impacts to Bear Creek (a water quality limited stream) and snow storage influences on offsite drainage patterns. Having addressed these issues by "Best Management Practices" assertions, without any actual site analysis of the adequacy on these steep slopes and large cut-and-fill actions, is insufficient. F13-10

Groundwater recharge can be observed each spring on the project site. Surface water flows "sub-out" on site. These waters serve to replenish groundwater resources. How will the project change the quality and quantity of these recharge waters? F13-11

Bear Creek is a non-compliant stream under state and federal law. BMP practices to date have not improved these conditions. Construction activities by the water district such as trenching and grading in 2016 caused soil erosion and bank failures along John Scott Rd that discharged muddy runoff conditions down the roadway, through local drainages and into Bear Creek. BMP's were assured, but were not monitored or enforced. Who will be responsible for active monitoring during the 20 years of construction activities? What is the county's enforcement plan? The public is asked to believe that these are appropriate mitigation measures (BMP's) but our experiences in Alpine Meadows demonstrate on-going failures of these permit conditions. F13-12

Forest Fires

California's annual fire season has grown from 138 days to 222 days. Alpine Meadows is a "high risk" forested area with an unprecedented dead tree outbreak. Why aren't these conditions, and the post-drought to post-wet winter conditions of Alpine and the surrounding Tahoe National Forest, described in the DEIR? Fire professionals that have met with the Bear Creek Association have told the residents that it is no longer "if" we will see a major (catastrophic?) forest fire, it is simply a matter of "when." Please explain what the current opinions are of the Fire Districts (local and regional), Cal Fire and the USFS regarding Alpine Meadows level of risk, especially in light of the 2017 fire season. Each of these entities need to be asked if building 48 new residences at Alpine Sierra is a safe action for the community. And, ask the same question re: White Wolf (38 additional residences also in the upper valley. F13-13

Fire professionals involved in the very recent North Bay fires of California have been consistent in these observations:

- Climate change is creating hotter and drier conditions in this state, wild land fires will be more common, hotter and more difficult to handle
- Land development at the wild-land interface has not been adequately planned or managed
- Too much development has occurred in high risk areas.

F13-14

Please describe in the EIR the county's understanding of each of these points and how it pertains to the Alpine Sierra development regarding public safety, emergency evacuation, fire protection, mitigation that would actually reduce the impacts to less than significant, and homeowner

insurance (more sense housing with more fire risks and less ability for adequate fire response.) F13-14 Cont.

Thousands of homes and several lives were lost in the first one hour of one recent fire, in another fire in the first two hours of fire. Fires leapt ahead as much as a mile at a time. Fire crews found themselves surrounded by fire. The Cal Fire battalion chief for the Mendocino Fire watched the fire move at 18 miles per hour. In one hour all of Alpine Meadows could be in fire. In 1-2 hours the entire Truckee River canyon from Tahoe City to Truckee could be in a full forest fire. The EIR needs to describe this "new reality" in the context of the Alpine Valley and the Highway 89 "only way out." The public deserves a more complete description regarding the family travel risks in a major forest fire in this setting. The "shelter-in-place" opportunity is very limited and deserves a serious review of it's likely use. Viewing the after-fire photos from the Wine Country it is hard to believe many people would choose to shelter in place versus drive their car, pets and key possessions out of the raging blaze. We ask the EIR to provide a realistic assessment of different fire scenarios and the associated public safety responses in the FEIR. F13-15

An early finding from the Sonoma Fires is that the parts of the county that are most prone to fire are also heavily reliant on a shrinking number of part-time and volunteer fire fighters. The public deserves a more realistic evaluation of the status of full-time, part-time and volunteer fire fighters at Alpine Meadows and at North Tahoe Fire District. How many fire fighters, by type, does the Alpine Fire District assume are "in place" at any given time? How many fighters are "in place" at the North Tahoe District? If we have a forest fire burning between Tahoe City and Alpine, and a concurrent fire at Alpine Sierra or Bear Creek, what can we expect from the available fire fighting resources? How many personnel could reach Alpine in what timeframes? And if we have trees falling and shutting down Hiway 89 south of Alpine, what is Plan B for the North Tahoe Fire District? F13-16

The FEIR needs to recognize that even a potential evacuation order, in July or August on a big weekend, will put all roads to Hiway 89 and Hiway 89 itself into gridlock. It does take two hours to drive from AM Lodge to Truckee, for fact, on big ski weekends. It takes 1.5 hours driving from AM lodge to Tahoe City on big weekends. Please describe the county's mitigation measures for the future condition of an evacuation order when the roads are already Level D or F.

Avalanche Hazard

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will effect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements at Alpine Sierra. The DEIR does not describe the future conditions that the climate models predict. Why not? Current science indicates the changes that will occur in this area will no longer resemble historical conditions above the site, onsite, below the site, or the site ingress/egress on AM Road. Please address this very important issue in the EIR. F13-17

Traffic Analyses

The DEIR fails to address the proposed project directly across AM Road from this site, the White Wolf Development. Why not? How can this EIR be represented as a public information and disclosure document if it fails to disclose a significant traffic and safety issue? As you know, White Wolf plans to develop 155 parking places, a helicopter pad, horse stables, more ski lifts and maybe another roller coaster, all of which feed into one access point on AM Rd. Please, for the sake of the community, do the traffic analysis that is appropriate for these projects. The absence of the White Wolf cumulative impacts in the EIR would fail to meet the most basic standards of government transparency.

The traffic modeling using a one-day unusual conditions traffic survey from 2011, then “modeled’ again in 2014 using the same weak date, has been pointed out (to the county) numerous times as inappropriate.The traffic study needs to be redone, to meet even minimal professional standards. County decisions using these substandard surveys will likely bring further CEQA appeals which is not in the interests of the public or our government (you). F13-18

The county assertion that the county standards for streets entering a main road can be waived for this project ignores the actual traffic patterns in that reach of AM Road, the winter snow and ice conditions, and the potential consequences of a 38-48 unit development traffic burden intersecting with another 38 unit development traffic load converging on AM Road. The county must provide a more compelling argument for why the standard can be waived. If this is waived for AS, will the county waive White Wolf? If the county intends to issue two waivers for traffic standards

non-compliance, the EIR must be very clear on how this is in the public interest.

The county assertions of LOS A and B for AM Road and Hiway 89 do not reflect 2-hour drive times from Truckee to AM Lodge, or the 1.5 hour drive times from AM Lodge to Tahoe City (actual conditions, 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the AM/89 signal is contrary to actual experiences both this last winter and this last summer. Said another way, it is delusional (the one-second claim) and suggests the authors should get out of the office and visit the site. F13-18 Cont.

Emergency Access

The emergency access evaluations ignore the reality of last winters conditions. During the large snow events the entire AM Road from lodge to Hiway 89 was a narrow 2-lane corridor with 6-8 foot snow banks. Traffic was bumper to bumper from the lodge to 89, bumper to bumper for much of 89 in both directions. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? Shouldn't the EIR desribe conditions like we experienced this last winter, given that these kinds of massive snow storms will be more frequent, not less? An additional fire truck as an appropriate mitigation measure falls short of addressing the big events requiring major emergency response measures. The DEIR isn't convincing in its description and evaluation of public safety and security for these conditions. F13-19

Noise

The noise analyses fails to evaluate the potential for construction noise over a 20-year build-out period. It fails to evaluate the noise impacts on the BCA Pond, a community feature in BCA that is heavily used all summer by many families. All construction noise in the narrow Alpine Valley is loud and echoes throughout the valley. Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these noise sources should be more specifically modeled to address summer impacts on sensitive receptors such as the BCA pond and the project neighbors. F13-20

GHGe's

The county failed to assess the GHGe levels of the vehicles from points of origin. Most of these units will be second homes, thus the vehicle miles traveled in and out of the development are not simply to local shopping, etc. What is the expected percentages of trips originated in the Bay Area, Southern California, Sacramento etc? Annual GHGe estimates for the development need to be disclosed and utilized in regional and state climate action planning, per state law. Annual emissions from the project will be in hundreds of tons, which will require offsets at some point. As the government body approving this "new source" what is the county plan for achieving future offsets? What is that "avoided cost" of GHGe offsets the county is taking on, in new tons of GHGe's that this project will generate over the next 30 years, and 50 years? Shouldn't the development commit to a certain level of offsets now, so the burden isn't left to the public later? F13-21

Cumulative Impacts

The county omitted White Wolf development, which will have potentially significant impacts on Alpine Sierra. The two developments will substantially impact traffic, noise, GHGe's, aesthetics, night sky, habitat, Bear Creek water quality, emergency vehicle response, forest fire response, among other issues. The DEIR will require substantial updating and inclusion of these future conditions, as the county has clearly been fully aware of these proposals for many months.

The cumulative impacts of Squaw Village combined with these two developments and the gondola are not adequately addressed in this DEIR. The county has kept separate five development projects that each directly or indirectly impact Alpine Meadow's traffic patterns, night sky, water resources, noise, aesthetics, emergency response, forest fire protection and Lake Tahoe water quality. Why aren't these collectively addressed in this EIR? Aren't these fully ripe for cumulative impacts assessment in this EIR? If not now, when will Placer County address the cumulative impacts of these five developments? F13-22

The public would be well served if the EIR more accurately and fully addressed the resources, current conditions and potential impacts of this project <u>and</u> the cumulative impacts of the Squaw Village, gondola, White Wolf and Stanford projects.

F13-22
Cont.

Thank you in advance for your responses to the above concerns and information requests.

Sincerely,

Daniel D. Heagerty
2030 Big John Rd
Alpine Meadows, CA 96145

Mailing Address:
116 Buena Vista Ave
Mill Valley, CA 94941

Response to Comment Letter F13

Daniel D. Heagerty
November 1, 2017

F13-1 The comment states that the Draft EIR uses outdated traffic survey information, weak hazards and emergency response analyses, omissions of substantial cumulative impacts and unsubstantiated conclusions regarding emergency response ingress/egress, public safety.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F13-2 The comment asks that the County clarify its Public Trust responsibilities.

Draft EIR Chapter 1 provides a summary of the County's requirements under CEQA and chapter 4 through 14 include relevant policies from the Placer County General Plan and Alpine Meadows General Plan and applicable County development standards.

F13-3 The comment states that the statement in the Draft EIR that no new information was received subsequent to publication of the Notice of Preparation is incorrect because the County received applications for other development projects – specifically the Village at Squaw Valley Specific Plan, the Squaw/Alpine gondola project, and the White Wolf project. The comment lists several issues of concern, including existing traffic congestion, water quality in the Truckee River, affordable housing, and fire hazards.

Please refer to Master Response 4, Traffic, Master Response 7, Hydrology and Water Quality, and Master Response 12 regarding the cumulative scenario. See also Master Response 14, Project Merits, as it pertains to affordable housing. Impacts related to affordable housing are evaluated in Draft EIR Impact 4.1.

F13-4 The comment states that the EIR must consider traffic patterns and safety at the project access point on Alpine Meadows Road in the context of the White Wolf project, which would access Alpine Meadows Road 160 feet from the project site access point.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their

centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F13-5 The comment expresses concerns regarding the major fire risk and the lack of adequate mitigation measures. The comment requests additional information regarding the County's fire preparedness, emergency response capabilities and firefighting resources in eastern Placer County.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F13-6 The comment states the Draft EIR does not address the impact of snow removal, onsite snow storage, and hydrological changes on neighboring properties. The comment asks why the snow storage and removal plan did not use the snow conditions of last winter in the impact assessment.

Please refer to Master Response 7, Hydrology and Water Quality, and Master Response 8, Snow Storage. The snow storage and removal plan is based on the County's standard snow storage requirements for projects in the region, which were developed with consideration for average and maximum annual snow accumulation data for the region.

F13-7 The comment states that the Draft EIR does not address emergency vehicle access during level of service F conditions on Alpine Meadows Road and State Route 89.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation.

F13-8 The comment states that the request for updated traffic analysis was ignored and the EIR relies on inappropriate data. The comment notes that the County has already received legal challenges on the same issue.

Please refer to Master Response 4, Traffic.

F13-9 The comment states that the visual impacts to Five Lakes Trail was identified as a significant issue by the public and that the visual simulation appears to minimize any potential visual impacts and is not convincing.

Please refer to Master Response 2, Visual Resources, regarding the methodology used in preparing the visual simulation.

F13-10 The comment states that the Draft EIR analysis of water resource impacts, including groundwater recharge, impacts to water quality in Bear Creek, and snow storage influence on offsite drainage patterns, is insufficient because it addresses these issues with Best Management Practices but does not include site-specific analysis of these practices given the project site's steep slopes and large cut-and-fill actions.

Please refer to Master Response 7, Hydrology and Water Quality.

F13-11 The comment states that groundwater recharge can be observed on the site each spring as surface water flows below ground. The comment questions how the project would change the quality and quantity of these recharge waters.

Please refer to Master Response 7, Hydrology and Water Quality.

F13-12 The comment states that Bear Creek does not meet state and federal water quality standards and that past construction activities that relied upon Best Management Practices resulted in soil erosion and bank failures that discharged muddy runoff into Bear Creek. The comment requests information on the monitoring and enforcement of mitigation measures throughout construction of the proposed project.

Please refer to Master Response 7, Hydrology and Water Quality.

F13-13 The comment states that the annual fire season has lengthened and Alpine Meadows is a high risk forested area. The comment requests information on the opinions of the fire districts, CalFire, and U.S. Forest Service regarding the level of fire risk and whether building the proposed project and the White Wolf development is a safe action for the community.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place. By implementing the proposed Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2), the project would reduce the intensity and rate of spread of any wildfire that occurs within the project site . This would provide a reduce fire risk for existing residences compared to the existing condition.

F13-14 The comment summarizes observations from fire professionals that climate change is increasing the risk of a major wildfire, land development at the wildland interface has not been adequately planned, and too much development has occurred in high-risk areas. The comment requests that the EIR evaluate how these points apply to the proposed project with respect to public safety, emergency evacuation, fire protection, mitigation, and homeowner fire insurance.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, Master Response 10, Shelter-in-Place, and response to comment F13-13.

F13-15 The comment describes the rate of spread of recent wildfires and estimates that all of Alpine Meadows could be on fire in one hour, and the entire Truckee River canyon could be on fire in one to two hours. The comment states that the EIR should evaluate this risk, elaborate on evacuation, and evaluate the feasibility of the shelter-in-place strategy.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F13-16 The comment states that an early finding from the Sonoma County fires is that the parts of that county that are most prone to fire are served by a shrinking number of fire fighters. The comment requests that the EIR provide more information on the number of fire fighters that serve the project site and how fire-fighting resources would be allocated throughout the region if multiple fires occur at the same time. The comment also states that the EIR must evaluate the ability of people to evacuate during periods of heavy traffic congestion.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F13-17 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs. These factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements at Alpine Sierra. The comment states the Draft EIR does not describe the future conditions that the climate models predict and the resulting changes in avalanche hazards.

Please refer to Master Response 11, Avalanche Hazards.

F13-18 The comment identifies several concerns with the traffic impact analysis, including that the Draft EIR fails to address the White Wolf project, the traffic modeling relies on data collected on a single day under unusual conditions and although this is then modeled to 2014 conditions it reflects an improper date, and that the County should not allow a variance from the intersection standards for the project site access point at Alpine Meadows Road. The comment states that the conclusions that the Alpine Meadows Road/State Route 89 intersection operates at level of service A and B and

that the project would add one second of additional delay to this intersection does not reflect the lengthy drive times experienced by existing residents.

Please refer to Master Response 4, Traffic, regarding the traffic impacts analysis data collection and modeling, analysis of cumulative impacts, and conclusions regarding levels of service. In regards to the requested Design Exception to the County's standard intersection design requirements for the Road A connection to Alpine Meadows Road, Draft EIR page 7-17 notes that the proposed design includes sufficient pavement tapers and would allow vehicles to enter and exit Road A without encroaching on other traffic lanes. Additionally, on pages 7-17 and 7-18, the Draft EIR finds that with implementation of Mitigation Measure 7.3a, the Road A connection to Alpine Meadows Road would include adequate sight distance in both directions to meet County requirements and ensure that vehicles entering Alpine Meadows Road would see an approaching vehicle. This would ensure an appropriate level of safety at this intersection.

F13-19 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F13-20 The comment asserts that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period and does not reflect the degree to which construction noise echoes through the valley. The comment inquires as to how mitigation measures will be enforced to ensure that noise levels are not significant, and states that construction activities should not be exempt from noise thresholds when those activities may occur over multiple years. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided and that the construction noise analysis consider the effects of the use of large equipment to construct roads and bridges, and requests that noise from these construction activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F13-21 The comment states that the analysis of greenhouse gas (GHG) emissions does not consider vehicle emissions from long-distance travel by owners and users of the recreation homes.

Draft EIR page 10-17 states "Emissions from motor vehicle use were estimated based on the assumption that 75% of the homes would be second-homes or vacation homes, as indicated in the Traffic Impacts Analysis prepared for the project (Draft EIR Appendix E1 through E3). Assumptions regarding trip lengths and frequency of long-distance trips made by vacationers arriving to and departing from the site are documented in the Alpine Sierra Trip Assumptions summary in Appendix G." Draft EIR Appendix G includes a table that identifies all assumptions regarding vehicle miles traveled, including trips made outside of the local area by owners and users of the recreation homes.

F13-22 The comment states that the Draft EIR analysis of cumulative impacts is inadequate because it does not consider the White Wolf development, which would contribute to impacts related to traffic, noise, greenhouse gas emissions, aesthetics and lighting, habitat, water quality, emergency response, fire hazards, and other issues. The comment also states that the cumulative impacts of the Village at Squaw Valley Specific Plan combined with the proposed project, White Wolf, and the gondola project are not adequately evaluated.

Please refer to Master Response 12, Cumulative Scenario.

Comment Letter F14

Shirlee Herrington

From: Lauren Ross <lauren7ross@yahoo.com>
Sent: Wednesday, November 01, 2017 1:07 PM
To: Placer County Environmental Coordination Services
Subject: RE: Bear Creek Association -Alpine Sierra Development-Comments Needed

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

I am taking the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. These are just a few of my concerns with the DEIR:

Traffic: Not acceptable that the traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall. And it fails to address the maximum capacity of the project during weekends and holidays. The EIR needs to take this into account plus other traffic issues. F14-1

Hazards: *"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."* F14-2

This is an unrealistic statement from the DEIR, Fire: Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.
Avalanche:Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F14-3

Biological resources: I am concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F14-4

Noise: The potential for construction noise over a 20-year build-out period I huge. The narrow Alpine Meadows Valley is echoes sound throughout the valley. The DEIR fails to address the neighboring subdivisions. F14-5

Geology
When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F14-6

Hydrology: Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F14-7

I/we hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Lauren Ross

PS My family was one of the original 100 investors in the creation of Alpine Meadows ski area. I have a long term interest in the area and how it is developed.

F14-7
Cont.

Response to Comment Letter F14

Lauren Ross
November 1, 2017

F14-1 The comment identifies concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, and the lack of consideration of the higher capacity during weekends and holidays.

Please refer to Master Response 4, Traffic.

F14-2 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter-in-Place strategy.

F14-3 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs. These factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements at Alpine Sierra. The comment states the Draft EIR does not describe the future conditions that the climate models predict and the resulting changes in avalanche hazards.

Please refer to Master Response 11, Avalanche Hazards.

F14-4 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the

project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F14-5 The comment states that construction noise occurring over a 20-year buildout would have a significant effect, that sound echoes throughout the Alpine Meadows Valley, and that the Draft EIR fails to address noise impacts to neighboring subdivisions.

Please refer to Master Response 6, Noise.

F14-6 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F14-7 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

November 1, 2017

Ms. Shirlee Herrington
Placer County Environmental Coordination Division
3091 County Center Drive
Auburn, California 95603

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Ms. Shirlee Herrington,

The Draft EIR for the Alpine Sierra Subdivision Project appears to fall short of Placer County's obligations under the California Environmental Quality Act. As with other recent EIR's produced by Placer County, this document uses outdated information (traffic surveys), weak analyses (fire hazards, emergency response), omissions of substantial cumulative impacts (Squaw Village, White Wolf, gondola) and (it appears) unsubstantiated conclusions (emergency response ingress/egress, public safety). It is frustrating to read a document intended to inform the public that in fact portrays grossly inaccurate road and traffic conditions that the project will further degrade. F15-1

The EIR would benefit from a summary discussion of Placer County's understanding of it's Public Trust responsibilities regarding the public interest in community health and safety. I ask the county to clarify for the public it's government responsibilities to ensure the protection of public health, safety and environmental protections, of both the Alpine Meadows community and the broader North Lake Tahoe environs. F15-2

Scoping Comments
Comments of significant importance to homeowners in Alpine Meadows and to the natural resources of the area that were submitted to Placer County appear to be missing in this DEIR. Specifically these issues include: F15-3

- Traffic patterns and safety at the project access to AM Road, given White Wolf proposed 155 parking spaces with one ingress/egress with 150 feet of Alpine Sierra's one ingress/egress.
- Forest fire risks and response is a major issue to our community yet the mitigation (a new fire truck) and overall plan seem trite when we reflect on the overwhelmed and inadequate fire planning and resources F15-4

evidenced in the Mendocino, Sonoma and Napa County fires. Please describe for us how Placer County may be different in it's fire preparedness, emergency response capacities and fire fighting resources. F15-4 Cont.

- Snow removal, onsite snow storage, hydrological changes to neighboring properties. The snow storage and removal plan does not appear to adequately account for the snow conditions of this last winter, why weren't those conditions specifically used for impact assessments? F15-5
- Emergency vehicle ingress/egress especially during Level F conditions (an existing condition during certain winter weekends and summer times, <u>this year</u> on AM Road, Hiway 89 intersection, and Hiway 89-Truckee and Hiway 89-Tahoe City). F15-6

The request for updated traffic analyses (versus outdated and technically deceptive traffic survey data for modeling) was ignored. The county's decision to use this inappropriate data has already caused citizen's the raise private funds to force remedy of the county's failing from the courts. Why did the county choose not to update it's traffic information and attempt to satisfy minimum professional engineering standards for traffic safety analyses? F15-7

The visual impacts to Five Lakes Trail was identified as a significant issue by the public. The trail is likely the most popular and heavily used trail in Northern Calif, the most popular trail in Placer County. I have hiked up to Five Lakes for 50+ years. F15-8

Bear Creek is a non-compliant stream under state and federal law. BMP's practices to date have not improved these conditions. Construction activities by the water district such as trenching and grading in 2016 caused soil erosion and bank failures along John Scott Rd that caused muddy runoff conditions down the roadway, through local drainages and into Bear Creek. BMP's were assured but were not monitored or enforced. Who will be responsible for active monitoring during the 20 years of construction activities? F15-9

Forest Fires
California's annual fire season has grown from 138 days to 222 days. Alpine Meadows is a "high risk" forested area with an unprecedented dead tree outbreak. Why aren't these conditions, and the post-drought to post- F15-10

wet winter conditions of Alpine and the surrounding Tahoe National Forest, described in the DEIR? Fire professionals that have met with the Bear Creek Association have told the residents that it is no longer “if” we will see a major (catastrophic?) forest fire, it is simply a matter of “when.” Please explain what the current opinions are of the Fire Districts (local and regional) regarding Alpine Meadows level of risk, especially in light of the 2017 fire season. F15-10 Cont.

Fire professionals involved in the very recent North Bay fires of California have been consistent in these observations:

- Climate change is creating hotter and drier conditions in this state, wild land fires will be more common, hotter and more difficult to handle
- Land development at the wild-land interface has not been adequately planned or managed
- Too much development has occurred in high risk areas.

Please describe in the EIR the county’s understanding of each of these points and how it pertains to the Alpine Sierra development regarding public safety, emergency evacuation, fire protection, mitigation that would actually reduce the impacts to less than significant, and homeowner insurance (more sense housing with more fire risks and less ability for adequate fire response.) F15-11

Thousands of homes and several lives were lost in the first one hour of one recent fire, in another fire in the first two hours of fire. Fires leapt ahead as much as a mile at a time. Fire crews found themselves surrounded by fire. The Cal Fire battalion chief for the Mendocino Fire watched the fire move at 18 miles per hour. In one hour all of Alpine Meadows could be in fire. In 1-2 hours the entire Truckee River canyon from Tahoe City to Truckee could be in a full forest fire. The EIR needs to describe this “new reality” in the context of the Alpine Valley and the Highway 89 “only way out.” The public deserves a more complete description regarding the family travel risks in a major forest fire in this setting. The “shelter-in-place” opportunity is very limited and deserves a serious review of it’s likely use. Viewing the after-fire photos from the Wine Country it is hard to believe many people would choose to shelter in place versus drive their car, pets and key possessions out of the raging blaze. We ask the EIR to provide a realistic assessment of F15-12

different fire scenarios and the associated public safety responses in the FEIR. F15-12 Cont.

An early finding from the Sonoma Fires is that the parts of the county that are most prone to fire are also heavily reliant on a shrinking number of part-time and volunteer fire fighters. The public deserves a more realistic evaluation of the status of full-time, part-time and volunteer fire fighters at Alpine Meadows and at North Tahoe Fire District. How many fire fighters, by type, does the Alpine Fire District assume are “in place” at any given time? How many fighters are “in place” at the North Tahoe District? If we have a forest fire burning between Tahoe City and Alpine, and a concurrent fire at Alpine Sierra or Bear Creek, what can we expect from the available fire fighting resources? How many personnel could reach Alpine in what timeframes? And if we have trees falling and shutting down Hiway 89 south of Alpine, what is Plan B for the North Tahoe Fire District? F15-13

The FEIR needs to recognize that even a potential evacuation order, in July or August on a big weekend, will put all roads to Hiway 89 and Hiway 89 itself into gridlock. It does take two hours to drive from AM Lodge to Truckee, for fact, on big ski weekends. It takes 1.5 hours driving from AM lodge to Tahoe City on big weekends. Please describe the county’s mitigation measures for the future condition of an evacuation order when the roads are already Level D or F.

Avalanche Hazard

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will effect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements at Alpine Sierra. The DEIR does not describe the future conditions that the climate models predict. Why not? Current science indicates the changes that will occur in this area will no longer resemble historical conditions.above the site, onsite, below the site, or the site ingress/egress on AM Road. F15-14

Traffic Analyses

The DEIR fails to address the proposed project directly across AM Road from this site, the White Wolf Development. Why not? How can this EIR be represented as a public information and disclosure document if it fails to disclose a significant traffic and safety issue? As you know, White Wolf plans to develop 155 parking places, a helicopter pad, horse stables, more F15-15

ski lifts and maybe another roller coaster, all of which feed into one access point on AM Rd. Please, for the sake of the community, do the traffic analysis that is appropriate for these projects.

The traffic modeling using a one-day unusual conditions traffic survey from 2011, then “modeled’ again in 2014 using the same weak date, has been pointed out (to the county) numerous times as inappropriate.The traffic study needs to be redone, to meet even minimal professional standards. County decisions using these substandard surveys will likely bring further CEQA appeals which is not in the interests of the public or the government.

The county assertion that the county standards for streets entering a main road can be waived for this project ignores the actual traffic patterns in that reach of AM Road, the winter snow and ice conditions, 38-48 unit development traffic meeting another 38 unit development across the AM Road. The county must provide a more compelling argument for why the standard can be waived. If this is waived for AS, will the county waive White Wolf? If the county intends to issue two waivers for traffic standards non-compliance, the EIR must be very clear on how this is in the public interest.

The county assertions of LOS A and B for AM Road and Hiway 89 do not reflect 2-hour drive times from Truckee to AM Lodge, or the 1.5 hour drive times from AM Lodge to Tahoe City (actual conditions, 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the AM/89 signal is contrary to actual experiences both this last winter and this last summer.

F15-15 Cont.

Emergency Access

The emergency access evaluations ignore the reality of last winters conditions. During the large snow events the entire AM Road from lodge to Hiway 89 was a narrow 2-lane corridor with 6-8 foot snow banks. Traffic was bumper to bumper from the lodge to 89, bumper to bumper for much of 89 in both directions. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions. The county has not developed meaningful emergency preparedness plans to address these current conditions.

F15-16

Noise

The noise analyses fails to evaluate the potential for construction noise over a 20-year build-out period. It fails to evaluate the noise impacts on the BCA Pond, a community feature in BCA that is heavily used all summer by many families. All construction noise in the narrow Alpine Valley is loud and echoes throughout the valley. Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the BCA pond and neighborhood. F15-17

GHGe's

The county failed to assess the GHGe levels of the vehicles from points of origin. Most of these units will be second homes, thus the vehicle miles traveled in and out of the development are not simply to local shopping, etc. What is the expected percentages of trips originated in the Bay Area, Southern California, Sacramento etc? Annual GHGe estimates for the development need to be disclosed and utilized in regional and state climate action planning, per state law. As the state moves to GHGe reductions how will this development, or the county, offset for the new tons of GHGe's that this project will generate over the next 30 years, and the 50 years? Should the development commit to a certain number of EV charging stations to help offset the GHGe loads? F15-18

Cumulative Impacts

The county omitted White Wolf development, which will have potentially significant impacts on Alpine Sierra. The two developments will substantially impact traffic, noise, GHGe's, aesthetics, night sky, habitat, Bear Creek water quality, emergency vehicle response, forest fire response, among other issues. The DEIR will require substantial updating and inclusion of these future conditions, as the county has clearly been fully aware of these proposals for many months. F15-19

The cumulative impacts of Squaw Village combined with these two developments and the gondola are not adequately addressed in this DEIR. The county has kept separate five development projects that each directly or indirectly impact Alpine Meadow's traffic patterns, night sky, water resources, noise, aesthetics, emergency response, forest fire protection and Lake Tahoe water quality. Why aren't these collectively addressed in

this EIR? Aren't these fully ripe for cumulative impacts assessment in this EIR?

The public would be well served if the EIR more accurately and fully addressed the resources, current conditions and impacts of this project and the cumulative impacts of the Squaw Village, gondola, White Wolf and Stanford projects.

F15-19 Cont.

Thank you in advance for your responses to the above concerns and information requests.

Sincerely,

Ann Van Ess
2030 Big John Rd
Alpine Meadows, CA 96145

Mailing Address:
260 Marvilla Circle
Pacifica, CA 94044

Response to Comment Letter F15

Ann Van Ess
November 1, 2017

F15-1 The comment states that the Draft EIR uses outdated traffic survey information, weak hazards and emergency response analyses, omissions of substantial cumulative impacts and unsubstantiated conclusions regarding emergency response ingress/egress, public safety.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F15-2 The comment asks that the County clarify its Public Trust responsibilities.

Draft EIR Chapter 1 provides a summary of the County's requirements under CEQA and chapter 4 through 14 include relevant policies from the Placer County General Plan and Alpine Meadows General Plan and applicable County development standards.

F15-3 The comment states that the EIR must consider traffic patterns and safety at the project access point on Alpine Meadows Road in the context of the White Wolf project, which would access Alpine Meadows Road 160 feet from the project site access point.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F15-4 The comment expresses concerns regarding the major fire risk and the lack of adequate mitigation measures. The comment requests additional information regarding the County's fire preparedness, emergency response capabilities and firefighting resources in eastern Placer County.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F15-5 The comment states the Draft EIR does not address the impact of snow removal, onsite snow storage, and hydrological changes on neighboring properties. The comment asks why the snow storage and removal plan did not use the snow conditions of last winter in the impact assessment.

Please refer to Master Response 7, Hydrology and Water Quality, and Master Response 8, Snow Storage. The snow storage and removal plan is based on the County's standard snow storage requirements for projects in the region, which were developed with consideration for average and maximum annual snow accumulation data for the region.

F15-6 The comment states that the Draft EIR does not address emergency vehicle access during level of service F conditions on Alpine Meadows Road and State Route 89.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation.

F15-7 The comment states that the request for updated traffic analysis was ignored and the EIR relies on inappropriate data. The comment notes that the County has already received legal challenges on the same issue.

Please refer to Master Response 4, Traffic, regarding the methodology and validity of the traffic impact study.

F15-8 The comment states that the visual impacts to Five Lakes Trail was identified as a significant issue by the public and that the visual simulation appears to minimize any potential visual impacts and is not convincing.

Please refer to Master Response 2, Visual Resources, regarding the methodology used in preparing the visual simulation.

F15-9 The comment states that Bear Creek does not meet state and federal water quality standards and that past construction activities that relied upon Best Management Practices resulted in soil erosion and bank failures that discharged muddy runoff into Bear Creek. The comment requests information on the monitoring and enforcement of mitigation measures throughout construction of the proposed project.

Please refer to Master Response 7, Hydrology and Water Quality.

F15-10 The comment states that the annual fire season has lengthened and Alpine Meadows is a high risk forested area and that these conditions were not described in the Draft EIR. The comment requests information on the opinions of local fire districts regarding the level of fire risk.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place. By implementing the proposed Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2), the project would reduce the intensity and rate of spread of any wildfire that occurs within the project site. This would provide a reduce fire risk for existing residences compared to the existing condition.

F15-11 The comment summarizes observations from fire professionals that climate change is increasing the risk of a major wildfire, land development at the wildland interface has not been adequately planned, and too much development has occurred in high-risk areas. The comment requests that the EIR evaluate how these points apply to the proposed project with respect to public safety, emergency evacuation, fire protection, mitigation, and homeowner fire insurance.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, Master Response 10, Shelter-in-Place, and response to comment F13-13.

F15-12 The comment describes the rate of spread of recent wildfires and estimates that all of Alpine Meadows could be on fire in one hour, and the entire Truckee River canyon could be on fire in one to two hours. The comment states that the EIR should evaluate this risk, elaborate on evacuation, and evaluate the feasibility of the shelter-in-place strategy, noting that most people would prefer to evacuate from a wildfire rather than shelter-in-place.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place. The Emergency Preparedness and Evacuation Plan (updated version provided in Final EIR Appendix J3) recognizes that most residents would prefer to evacuate. However, the NTFPD has indicates that there are instances where shelter in place is necessary (e.g., fire threat is not imminent at one location but is at another and roadways need to remain free-flowing to ensure orderly evacuation). The proposal to provide Shelter-in-Placer facilities allows people within the project site a viable option to protect themselves during a wildfire and allows NTFPD to most effectively manage the local and regional response to a fire.

F15-13 The comment states that an early finding from the Sonoma County fires is that the parts of that county that are most prone to fire are served by a shrinking number of fire fighters. The comment requests that the EIR provide more information on the number of fire fighters that serve the project site and how fire-fighting resources would be

allocated throughout the region if multiple fires occur at the same time. The comment also states that the EIR must evaluate the ability of people to evacuate during periods of heavy traffic congestion.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F15-14 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs. These factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements at Alpine Sierra. The comment states the Draft EIR does not describe the future conditions that the climate models predict and the resulting changes in avalanche hazards.

Please refer to Master Response 11, Avalanche Hazards.

F15-15 The comment identifies several concerns with the traffic impact analysis, including that the Draft EIR fails to address the White Wolf project, the traffic modeling relies on data collected on a single day under unusual conditions and although this is then modeled to 2014 conditions it reflects an improper date, and that the County should not allow a variance from the intersection standards for the project site access point at Alpine Meadows Road. The comment states that the conclusions that the Alpine Meadows Road/State Route 89 intersection operates at level of service A and B and that the project would add one second of additional delay to this intersection does not reflect the lengthy drive times experienced by existing residents.

Please refer to Master Response 4, Traffic, regarding the traffic impacts analysis data collection and modeling, analysis of cumulative impacts, and conclusions regarding levels of service. In regards to the requested Design Exception to the County's standard intersection design requirements for the Road A connection to Alpine Meadows Road, Draft EIR page 7-17 notes that the proposed design includes sufficient pavement tapers would allow vehicles to enter and exit Road A without encroaching on other traffic lanes. Additionally, on pages 7-17 and 7-18, the Draft EIR finds that with implementation of Mitigation Measure 7.3a, there would be adequate sight distance along Alpine Meadows Road to allow for vehicles on Alpine Meadows Road to stop before striking an object (or side street vehicle) that comes into view at the access intersection. Furthermore, there is adequate sight distance for a driver turning onto Alpine Meadows Road from Road A to determine whether they can safely enter the roadway. This would ensure an appropriate level of safety at this intersection.

F15-16 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F15-17 The comment asserts that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period and does not reflect the degree to which construction noise echoes through the valley. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided and that the construction noise analysis consider the effects of the use of large equipment to construct roads and bridges, and requests that noise from these construction activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F15-18 The comment states that the analysis of greenhouse gas emissions does not consider vehicle emissions from long-distance travel by owners and users of the recreation homes.

Draft EIR page 10-17 states "Emissions from motor vehicle use were estimated based on the assumption that 75% of the homes would be second-homes or vacation homes, as indicated in the Traffic Impacts Analysis prepared for the project (Draft EIR Appendices E1 through E3). Assumptions regarding trip lengths and frequency of long-distance trips made by vacationers arriving to and departing from the site are documented in the Alpine Sierra Trip Assumptions summary in Draft EIR Appendix G." Appendix G includes a table that identifies all assumptions regarding vehicle miles traveled, including trips made outside of the local area by owners and users of the recreation homes.

F15-19 The comment states that the Draft EIR analysis of cumulative impacts is inadequate because it does not consider the White Wolf development, which would contribute to impacts related to traffic, noise, greenhouse gas emissions, aesthetics and lighting, habitat, water quality, emergency response, fire hazards, and other issues. The

comment also states that the cumulative impacts of the Village at Squaw Valley Specific Plan combined with the proposed project, White Wolf, and the gondola project are not adequately evaluated.

Please refer to Master Response 12, Cumulative Scenario.

Comment Letter F16

Placer Co. Environmental Coordination Services Division
Attn: Shirlee Herrington November 2, 2017
Re. Draft EIR for Alpine Sierra Subdivision

Dear Placer County,

As a homeowner for almost 35 years at 1855 John Scott Trail, I have some comments about the proposed subdivision. Thank you for taking our comments and I hope that you will help the developers of this project, as well as the many other proposed projects in Alpine Meadows Valley, to consider the whole valley when agreeing their cumulative designs and scopes. F16-1

Considering the current Draft EIR, Project Description: 2.3

Objective 1: I doubt that residents that live at the upper northeast area of the subdivision will actually walk to the ski area in the winter, so this will impact the already busy Alpine Meadows Road. I see no plans for a traffic light to manage the flow. How about the developer and HOA creating a shuttle to take the residents up to the ski area? Or working with Squaw/Alpine to establish one? The stretch of Alpine Meadows Road in winter can be very icy and dangerous. F16-2

Objective 3: I advise keeping the number of houses to 38, which is one of the objectives mentioned. With all the other proposed developments in the foreseen future, we need to make a long term plan, not just go forward with more density than minimally required. F16-3

Objective 6: We are appreciative of this objective, but honestly, this was done only from pressure and lack of backing the last time around, not out of choice by the developer. A majority of Bear Creek residents were against an access road in the past proposal for this project, as were many of the Alpine Meadows residents near the northeast corner on John Scott Trail past the avalanche gate. It will be difficult enough when the County needs to open the avalanche access gate since John Scott Trail is very narrow in many parts and only one car width, not made for the mostly oversized SUV 4 wheel drive vehicles that are prevalent in winter. F16-4

Objective 7:We all know that single access roads reduce fire safety. After looking at how the 2017 fire storms decimated Napa and Sonoma neighborhoods, Shelter in Place concepts do not deal in reality. Evacuation is key and this is another reason to have two ways out to our already one way evacuation out of the whole valley. If it is true that the project doesn't meet the County Zoning regulations, which require at least two vehicle entry/exit points, this street design should be changed. No amount of "safe" building materials can withstand a fire storm. F16-5

Objective 10: There is not a lack of supply of high quality vacant home sites in Alpine Meadows Valley. There are many large lots with old and outdated small houses that F16-6

need to be renovated, and there are also buildable empty lots that frequently come up for sale. F16-6 Cont.

I found the maps and supportive materials very difficult to access on line. I'm concerned about the public trail that is planned to enhance the existing trail system. I don't see it on the small hand out map. There it looks like it ends at the most northeastern lot and just merges into the street. This needs to be clarified. These are trails that are used by horses. The long standing Horse Riding business at the bottom of Alpine Meadows Road is an integral part of our valley and needs to be sure to have access to the same areas they have been riding on for decades. F16-7

Bear Creek is of utmost concern. It was stated in the DEIR that "The Initial Study concluded that the proposed project does not have the potential to result in significant impacts in resource areas." This riparian habitat is home to many animals and plants in the valley, providing water and nourishment to them especially in the summer, when construction would be at it's peak. How can all this construction take place without affecting the creek? There are so many streams and springs in our valley and they all provide our drinking water as well as habitat. The species of concern warrant keeping development to a minimum. Bear Creek leads to the BCA pond, as well as Alpine Meadows pond near the fire station, both used by hundreds of residents during the summer and fall. Especially with the other development plans potentially adding to the impact on our creek. Please do consider all the projects that may be taking place in the valley! F16-8

The DEIR in the current state, is confusing. I don't understand many of the explanations regarding the impacts of the project. It's difficult to read. I think more work needs to be done to explain the impacts and their alternatives before going forward with this project. F16-9

Thank you for taking these comments into account when deciding the fate of our valley.

Sincerely,

Elaine Geffen
elaineofpew@gmail.com

Response to Comment Letter F16

Elaine Geffen
November 2, 2017

F16-1 The comment provides introductory remarks.

The comment does not question the accuracy or adequacy of the Draft EIR or address the environmental effects of the project. No response is required.

F16-2 The comment discusses Objective 1 and states that residents in the northeast area will walk to the ski area; additionally, the proposed project does not include a traffic light and the proposed project should include a shuttle to take residents to the ski area.

Please refer to Master Response 14, Project Merits.

F16-3 The comment discusses Objective 3 and states that the number of dwelling units should be reduced to 38 and that, with all the other proposed projects, the County needs to make a long term plan and not approve density than minimally required.

The comment does not question the accuracy or adequacy of the Draft EIR or address the environmental effects of the project. No response is required.

F16-4 The comment discusses Objective 6 and states that it was only added because of pressure by the public. Additionally the comment states that it would be difficult to open the avalanche access gate because the John Scott Trail is narrow and not made for oversized SUV 4 wheel drive vehicles.

The comment does not question the accuracy or adequacy of the Draft EIR or address the environmental effects of the project. No response is required.

F16-5 The comment discusses Objective 7 and states that single access roads reduce fire safety, shelter in place concepts are not realistic, evacuation is key, and the design should be changed in order to be compliant with the County's requirement to provide two points of access.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place. The Emergency Preparedness and Evacuation Plan (updated version provided in Final EIR Appendix J3) recognizes that most residents would prefer to evacuate. However, the NTFPD has indicates that there are instances where shelter in place is necessary (e.g., fire threat is not imminent at one location but is at another and

roadways need to remain free-flowing to ensure orderly evacuation). The proposal to provide Shelter-in-Place facilities allows people within the project site a viable option to protect themselves during a wildfire and allows NTFPD to most effectively manage the local and regional response to a fire..

F16-6 The comment discusses Objective 10 and states that there is not a lack of high quality homes in Alpine Meadows, there are empty lot, and that older, outdated, smaller homes can be renovated.

Please refer to Master Response 14, Project Merits.

F16-7 The comment expresses concern that project materials, such as maps and supportive materials, were difficult to access online. The comment also expresses general concern regarding the proposed public trail. The comment states that the trail is not visible on the provided handout map and that the trail appears to end at the most northeastern lot and merge into the street. The comment requests clarification regarding the location of the trail that areas where existing equestrian access is allowed be maintained.

The County posted the Draft EIR and its appendices on the County's website, in accordance with the County's standard procedures. Hard copies were also available for review at the County's Tahoe Planning Division office and the Tahoe City library. Please refer to Master Response 1, Existing and Proposed Trail.

F16-8 The comment questions how all the construction will not affect riparian and water sources in the area, specifically Bear Creek, the Bear Creek Association pond, Alpine Meadows pond, and various other streams and springs.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects riparian and water resources in the area.

F16-9 The commenter provides conclusory remarks and states that the Draft EIR is confusing, difficult to read, and requires more work on the impact and alternative explanations.

The comment does not identify specific deficiencies in the EIR, thus no response is required. Please refer to Master Response 13 regarding the project alternatives.

Comment Letter F17

November 2, 2017

TO:
Alex Fisch,
Maywan Krach,
Placer County Community Resources Development Agency
3091 County Center Drive
Auburn, CA 95603

To Whom It May Concern:

Thank you for taking the time to review public comment on the draft EIR for the Alpine Sierra subdivision. I apologize I was unable to attend the public meeting on October 26th, however, work obligations prevented me from doing so.

This letter is intended to register concerns about the proposed Alpine Sierra subdivision. I would like to note that I am not opposed to responsible development in the Tahoe Basin, including the redevelopment of disturbed land (in Squaw), or the enhancement of existing urban centers (in Tahoe City). However, I believe this subdivision is not suitable for Alpine Meadows. Specifically, there are three key areas of concern: (1) there is no demonstrated need for this project, nor evidence of its positive economic impact , (2) potentially "unpredictable" fire and avalanche hazards—particularly as they relate to the eastern parcel, and (3) the loss of valuable biologic resources—particularly as they relate to the eastern parcel. F17-1

Project Purpose and Impact

A stated purpose of this project is to "provide large-lot single family home sites *to address the lack of supply of high quality homes sites in the Alpine Meadows Valley*" (16-19). A review of the current and historic data surrounding home sales in Alpine Meadows helps asses the validity of this claim. At the moment, there are 14 homes, 2 condominiums, and 6 buildable lots for sale in Alpine Meadows. Of the homes, 7 are listed at over $1 million. The average square footage of these million dollar homes is 3,217 square feet. The average age of these homes is 10 years, and they have an average listing period of 97 days. For those in the market for architect-designed, high-finish vacation homes, Alpine offers numerous opportunities. F17-2

In fact, Alpine Meadows offers a wide array of home ownership possibilities—from condos at 300-400k, to more modest 3-4 bedroom homes between 550-850k. Homes are available in all 3 existing subdivisions, as well as the condo developments at the bottom and top of the valley. Added to these existing structures are 6 buildable lots that could accommodate homes up to 3,500 square feet. This data shows that Alpine Meadows does not require an additional subdivision to meet the needs of potential home buyers.

I could be persuaded to overlook this data if the proposed project would stimulate the local economy or add affordable housing for full-time residents. However, the draft EIR states, "the increase in economic activity would be marginal" (16-16). And despite the assertion that "the proposed project would affect the local economy through construction of new residences that would encourage people to live in Placer County" (16-15). The next page states "the single-family residences constructed on-site *are expected to be largely seasonal vacation homes*." (16-16). Thus, the majority of this project (and specifically, the eastern parcel) would not be intended to serve Placer County residents, nor would it have a significant positive impact on the local economy. F17-2 (cont)

I also question that this development would be "walkable distance to the ski area," an assertion that might enhance its appeal. For residents of the eastern parcel, the walking distance to the ski area base would be over 2.5 miles. Moreover, Alpine Meadows road is not suitable for walking during the winter months due to snow removal, high-volume traffic, steepness, and a lack of margin/walking path. This project does not propose a maintained easement or paved trail on the main road that would facilitate walking to the ski area. Unlike the Squaw development, the infrastructure and distances in Alpine make walking an entirely unrealistic option for this development. F17-3

There is no demonstrated need, nor economic upside to this development. Additionally, the majority of the proposed home sites are located on the biologically sensitive and hazard-prone eastern parcel. I urge the County to consider a proposal that removes the eastern parcel development or to select Alternative C1. F17-4

Natural Hazards and the Eastern Parcel.

While the development planned for the western part of the parcel offers accessible, diverse residential options, the eastern parcel, raises concerns surrounding both avalanche and fire risk.

Per the draft EIR, "WARNING. avalanches occur naturally, suddenly, and unpredictably." (Appendix J). However, on the next page the draft EIR promises that the avalanche path directly above the eastern parcel would never run below 6900 feet, and therefore never endanger the home sites. Anyone with avalanche experience in Alpine Meadows knows that underestimating the destructive and—in your words, unpredictable—nature of avalanches is potentially fatal. While avalanches may not put homes at significant risk, the pedestrians in this new subdivision will vulnerable during storm cycles while using the recreational network of trails and streets (even walking to the ski area). In the recent past, avalanches have buried and killed pedestrians in Alpine Meadows above the proposed development site. F17-5

Additionally, the road that connects the eastern portion of the development to Alpine Meadows Rd runs through at least one significant avalanche path. A slide here could severely impact access in the case of an emergency. By way of anecdote, while I was walking at the F17-6

juncture of John Scott and Park Dr in Bear Creek last winter I was turned around by stationed CHP officers on three separate occasions due to avalanche danger. Please keep in mind, this was significantly further down than the deposition zone proposed in the draft EIR. F17-6 (cont)

Avalanche considerations have always been significant in Alpine Meadows, however, the risk of wildfire may be potentially more catastrophic. While home insurance cancellations are inconvenient, the recent events in Sonoma and Napa should give us all pause. The proposed development has ***no*** exit for the eastern parcel in the event of a wildfire. Shelter in place and strong defensible space maintenance would not provide appropriate mitigation if Alpine experienced an event similar to what happened in Grass Valley, Sonoma, Napa, or even Mariposa this past summer. The only access road to the eastern parcel could easily become blocked in the event of a fire, stranding homeowners. This is unacceptable and irresponsible development. While climate change may lessen the risk of avalanches, the risk of wildfires is growing every year. Please consider the recent fires as examples of what could be possible in Alpine Meadows. F17-7

In light of these very tangible risks, this development should not be approved until an alternative that removes the eastern parcel has been made available for review. Please choose Alternative C1. F17-8

Biologic Resources

Unlike recent Squaw or Tahoe City developments, the Sierra Alpine subdivision would be built on 100% virgin forest, a forest that backs up to USFS land and provides valuable habitat for special status species. The forest reduction required for this project to meet defensible space requirements would substantially impact the nesting patterns of birds and the foraging habits of wildlife that currently make use of this land. Additionally, the draft EIR states that there are developed home sites 1,000 feet in either direction from the proposed development. This is incorrect. This parcel creates a corridor that connects the watershed of Scott Peak all the way to the Buttress adjacent to White Wolf. F17-9

Specifically, the draft EIR states the observation of the Yellow Warbler in the proposed development parcel may indicate nesting in the area. Such nesting would require a cessation of work from May-August until chicks mature. This is the prime building season in Alpine Meadows.

Every year, Alpine Meadows hosts a bird watching event for one day in July. For the past 6 years, I have participated in this event with my mother who is an avid amateur ornithologist. During these 6 years, we have kept records of our sightings. We have recorded over 17 sightings of Yellow Warblers in the last 6 years on this one day alone. Of those 17, 6 were adjacent to the parcel site, and 3 were of pairs (in years 2017, 2015, and 2014). It is clear from anecdotal evidence collected over several years that this parcel provides vital habitat for sensitive species. F17-10

While environmental concerns like these are often overlooked in development discussions, the developer can be assured that if this project is approved, his parcel boundaries will be full of amateur ornithologists videoing Yellow Warblers and reporting violations to Fish and Game.

This development would occur entirely on undisturbed land that provides critical ecological resources to special status species and all wildlife in Alpine Meadows. Because of this, I urge you to choose Alternative C1 or require a proposal that eliminates the development in the particularly sensitive eastern parcel. F17-11

Conclusion

Placer County has an obligation to its constituents to support good projects that benefit both the community and the developer. The proposed Alpine Sierra subdivision would not fill a demonstrated need, and the potential "unpredictable" hazards that could impact the project present an unnecessary risk for residents and emergency personnel. Moreover, Placer County has done a good job approving developments that will positively impact our local economy, provide jobs, and affordable housing for locals (Squaw & Tahoe City). This project achieves none of these goals.

I urge the County to consider Alternative C1, or, an unexplored alternative that removes the development on the eastern parcel. A development on the western parcel alone would adequately address all the concerns listed above.

Thank you for your time and consideration.

Sincerely,

Dr. Katherine Hover-Smoot
Professor, Sierra College

1529 Mineral Springs Trail
Alpine Meadows CA 96146
408-623-5871
khoversmoot@gmail.com

A hard copy of this letter has been sent to Placer County as well.

Response to Comment Letter F17

Dr. Katherine Hover-Smoot
November 2, 2017

F17-1 The comment states that the proposed project is not suitable for Alpine Meadows because there is no demonstrated need for the project or evidence that it would have a positive economic impact, the substantial fire and avalanche hazards, and the loss of biologic resources.

Please refer to Master Response 3, Biological Resources, Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, Master Response 11, Avalanche Hazards, and Master Response 14, Project Merits.

F17-2 The comment discusses residential real estate trends and statistics for the area and states that there is no need for the proposed project.

Please refer to Master Response 14, Project Merits.

F17-3 The comment states that walking to the Alpine Meadows ski area from the project site is not realistic.

Please refer to Master Response 14, Project Merits.

F17-4 The comment states that there is no need for or economic benefit from the project and that the majority of the proposed home sites are located on the biologically sensitive and hazard-prone eastern parcel. The comment recommends removing the eastern parcel from development or selection of Alternative C1.

Please refer to Master Response 13, Alternatives, and Master Response 14, Project Merits.

F17-5 The comment identifies concern with the fire and avalanche hazards on the eastern portion of the project site. The comment states that avalanches can be unpredictable and thus the comment questions the conclusions of the Avalanche Hazard Report regarding the maximum runout length of avalanches.

Please refer to Master Response 11, Avalanche Hazards. The Avalanche Hazard Report was prepared by a qualified expert with experience in the Alpine Meadows valley and Sierra Nevada region and is based on site-specific data and industry-standard avalanche hazard modeling.

F17-6 The comment states that proposed Road A would pass through an avalanche hazard area and describes the commenter's experience of being turned back while walking by California Highway Patrol officers who informed her of avalanche danger at the juncture of John Scott Trail and Park Drive.

Please refer to Master Response 11, Avalanche Hazards. Construction of Road A through the avalanche hazard area is expected to reduce the potential for avalanches to occur in this location.

F17-7 The comment states that the risk of wildfires and the lack of a secondary access point would expose people in the eastern portion of the project site to unacceptable hazards. The comment states that defensible space and shelter-in-place facilities would not be sufficient if the area faces a wildlife similar to those of the 2017 fire season.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F17-8 The comment states that due to the avalanche and fire risks, no development should be approved on the eastern portion of the site.

Please refer to Master Response 13, Alternatives.

F17-9 The comment states that the project would develop a previously undisturbed forest that backs up to U.S. Forest Service land and provides valuable habitat for special status species. The comment states that meeting the defensible space requirements would substantially impact the nesting patterns of birds and the foraging habits of wildlife that currently make use of this land. The comment states that the Draft EIR inaccurately characterizes the amount of development adjacent to the site, and that the project site creates a corridor that connects the watershed of Scott Peak all the way to the Buttress adjacent to White Wolf.

Please refer to Master Response 3, Biological Resources.

F17-10 The comment provides anecdotal evidence regarding the presence of yellow warblers at and adjacent to the project site and states that the requirement to avoid construction during the nesting season is critical to protect this species but would conflict with the typical construction season in the project area.

Please refer to Master Response 3, Biological Resources.

F17-11 The comment provides concluding remarks, reiterating that the project would adversely affect biological resources, no development should be approved on the eastern portion of the project site, the project site presents too many hazards, and the project does not provide any economic benefits to the community.

Please refer to Master Response 3, Biological Resources, Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, Master Response 10, Shelter-in-Place, Master Response 11, Avalanche Hazards, Master Response 13, Alternatives, and Master Response 14, Project Merits.

Comment Letter F18

Shirlee Herrington

From: jennifer absey <jenniferabsey@me.com>
Sent: Friday, November 03, 2017 1:17 PM
To: Placer County Environmental Coordination Services
Subject: Comments re: ASD dEIR

Placer County Community Development Resource Agency

Environmental Coordination Services

3091 County Center Drive, Suite 190

Auburn, CA 95603

cdraecs@placer.ca.gov

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to weigh-in on this mightily long dEIR for the Alpine Sierra Development.

I am a second home resident in Bear Creek and am concerned that a number of points have not been covered adequately, need more research and/or are conflicting statements.

The traffic analysis are weak. They are from record low snow years and do not take into consideration the route through Hwy 89, ever increasing traffic on ski days and holidays, the cumulative impacts of the Whitewolf & Squaw Valley Developments along with Martis and Homewood developments. It does not include the fact the recreational homes generate more traffic due to higher density and large numbers of people staying in them for a short period. F18-1

There is no mention or accounting for Emergency Response times. What would greater density do to avalanche, fire or health emergency in Level F traffic conditions in a key-hole valley? F18-2

The shelter-in place solution is frightening considering the enormous size and ferocity of the recent Santa Rosa firestorm. This needs to be reconsidered. F18-3

The visual impacts are largely misrepresented, for color, scale and glare.The trees removal is glossed over and not clear enough to protect habitat, biodiversity and hide the development especially from the Granite Peaks Trail. F18-4

There is a direct conflict between the proposed building season and nesting sessions. F18-5

The noise from a 20-25 year build out especially if Whitewolf, the base-to-base Gondola, the Squaw Resort will be intolerable. F18-6

The health of Bear Creek and the Truckee watershed regarding sediment and run-off sediment are not specific enough. F18-7

I do not agree with the dEIRs conclusion re: Hydrology and Geology. Have all the governing boards weighed in on this? The amount of blasting required to put the proposed road in will drastically change the water dynamics, avalanche possibilities. etc.Please review and research this more carefully. F18-8

The dEIR does not address the amount of snow that will be pushed onto BCA property in heavy snow years. F18-9

I support any person who wants to follow a dream and develop property. The owner and developer of Alpine Sierra has worked diligently to bring this project to conclusion. My deep concern is the the owner will sell ASD as soon as he clears all the permissions to do so. The new owner/ developer may not ne so mindful. This property was all part of the General Plan established in the early 60s. Times have changed. Traffic has changed. The climate has changed. This is a fragile mountain ecosystem the may have reached it's maximum. Too many developments could push it over to a point of no return. By then it will be too late. At some point we just have to stop. F18-10 F18-11

My preference is to have the project not be green-lighted by Placer County & if it is, I am requesting that further study and thought go into addressing my concerns. F18-12

Thank you for your time,

Jennifer Absey
jenniferabsey@me.com

23158 Gonzales Dr.
Woodland Hills, CA 91367

AND:

2022 John Scott Trail
Alpine Meadows, CA 96146

h: 818.704.1865
c: 818.425.2432

Response to Comment Letter F18

Jennifer Absey
November 3, 2017

F18-1 The comment provides introductory remarks and states that the traffic analysis is weak, is based on faculty data from a record low snow year, and does not consider increased ski and holiday traffic, higher traffic from recreational homes, and the cumulative impacts of the White wolf, Squaw Valley, Martis, and Homewood developments.

Please refer to Master Response 4, Traffic, which discusses the data, assumptions, and methodology used in the traffic impacts analysis and the validity of that analysis.

F18-2 The comment states that there is no mention of emergency response times and questions what the greater density would affect avalanche, fire or health emergency in Level F traffic conditions in a key-hole valley.

Please refer to Master Response 5, Emergency Response and Evacuation.

F18-3 The comment states that the shelter-in-place strategy needs to be reconsidered.

Please refer to Master Response 10, Shelter-in-Place.

F18-4 The comment states that the visual impacts are largely misrepresented, for color, scale and glare as the tree removal isn't included and not clear enough to protect habitat, biodiversity and hide the development from the Granite Peaks Trail.

Please refer to Master Response 2 regarding the methodology used in preparation of the visual simulation.

F18-5 The comment states that there is direct conflict between building season and nesting season.

Please refer to Master Response 3 regarding the effect of mitigation measure implementation on project construction.

F18-6 The comment states that the noise from a 20 to 25 year buildout will be intolerable, especially with Whitewolf, the base-to-base Gondola, and the Squaw Resort.

Please refer to Master Response 6, Noise.

F18-7 The comment states that the sedimentation analysis of the health of Bear Creek and the Truckee watershed is not specific.

Please refer to Master Response 7, Hydrology and Water Quality

F18-8 The comment question the hydrology and geology conclusions and whether all governing bodies have reviewed the analysis. The comment states that the proposed road will drastically change water dynamics and avalanche possibilities.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions.

F18-9 The comment states the Draft EIR does not address the amount of snow that will be pushed onto Bear Creek Association property in heavy snow years.

Please refer to Master Response 8, Snow Storage. All snow storage is expected to occur within the project site boundaries.

F18-10 The comment expresses support for development in general and expresses concerns that the project site owner will sell the development to a less mindful owner as soon as approvals are granted.

The comment does not address the accuracy or adequacy of the Draft EIR. Should the owner chose to sell, the mitigation measure obligations and conditions of approval would transfer to any future owner.

F18-11 The comment states that this property was part of the 1960s General Plan but traffic, climate, and times have changed and the fragile mountain ecosystem can not handle too many developments.

The comment does not address the accuracy or adequacy of the Draft EIR. Please refer to Master Response 3 Biological Resources and Master Response 4, Traffic.

F18-12 This comment provides conclusory remarks and states that the commenter prefers no project but requests further study and thought.

The comment does not address the accuracy or adequacy of the Draft EIR. No response is required.

Comment Letter F19

Shirlee Herrington

From: Dean <dean.amundson@gmail.com>
Sent: Friday, November 03, 2017 4:33 PM
To: Placer County Environmental Coordination Services
Subject: Comments on Alpine Sierra Draft EIR

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. We have the following concerns with the DEIR:

General Plan Consistency

Relying on the 1968 Alpine Meadows General Plan as a basis for assessing the compatibility of the Alpine Sierra development with planning for development in the Alpine Meadows valley is fundamentally flawed. The Alpine Meadows General Plan will be 50 years old next year. It predates virtually all development in the valley. It predates even CEQA under which we are now discussing the merits of this project. This document no longer meaningfully reflects any of the vision or objectives for development in the Alpine Valley. Furthermore, the Alpine Sierra development is the largest development that has been proposed in the valley in 30 or 40 years. To rely on this out-of-date vision for the valley, now that the valley is almost completely developed, as a basis for considering compatibility of the largest development in decades, is a measure of foolishness. It is a disservice to the residents and visitors of the area to not meaningfully consider this development in the context of the current conditions. F19-1

This inadequacy is further highlighted by conditions created by KSLs purchase of the Alpine Meadows Ski Resort. The proposed development at the base of Squaw Valley is substantial and, it is worth noting, required a new Specific Plan in order to proceed. The effects of this development are directly linked to the Alpine Meadows valley as KSL attempts to directly (e.g., gondola) and the shared ownership results in spillover effects from Squaw Valley (e.g., traffic, Gasex exploders). Placer County should not be contemplating the largest development projects in decades based on planning that long ago ceased to be reflective of conditions in the valley. F19-2

Visual Resources

The visual resource analysis fails to consider impacts to users of existing US Forest Service trail adjacent to and on the Alpine Sierra property. This US Forest Service trail has a long history and a high level of use. Recreational users of this trail have an expectation of high visual quality. A side loop of this trail even extends out around a rocky open area on the property where there is a scenic view of the valley and the hillside above Alpine Meadows Road. These users of this trail and this overlook will be significantly impacted by the proposed development. F19-3

How do the surrounding residents and visitors know that the proposed residential units will be visually compatible with surrounding areas and not present a uniquely uncharacteristic visual effect? Other housing areas in the valley (AMEA, BCA and JMA) all share a combined design review committee, which ensures that development will be consistent throughout the valley, and residents in one area have a say in development in another. Alpine Sierra proposes to have its own design committee, so how are residents and visitors to know that the development will not develop standards that are highly incompatible with the surrounding development or environment? F19-4

MM3. The requirement that the development be dark sky compliant is excellent, but dark sky mitigation generally goes to avoidance of night sky effects. It does not directly speak to potential adverse effects of lighting on neighboring residences. For example, since BCA residences are downslope from Alpine Sierra, lighting in Alpine Sierra, even shielded lighting, may extend off site and substantially and adversely affect these adjacent neighborhoods. How will lighting guidelines ensure there are no adverse lighting impacts on adjacent properties? F19-5

Lastly, the EIR needs to provide a photo of existing conditions for comparative purposes to Figure 5-4. F19-6

Chapter 6 – Biological Resources

The statement that there are residences 1,000 feet up hill and down hill implies the site is essentially infill. This does not adequately account for the substantial portion of the property that is bounded by USFS lands. The narrow band of the property is bounded by residential uses/roadways; however, the larger portion of the property is largely open to adjacent USFS lands. Bears are frequently seen in this area and likely use it as a transit route from open forest/dens sites on USFS land to streams and Bear Creek. Other species may as well.

The DEIR indicates that Yellow Legged Frog are not present on the site due to lack of suitable habitat, but what about indirect effects of sedimentation on downstream habitat for yellow legged frog? F19-7

Chapter 7 - Transportation

The transportation analysis relies on 2012 traffic survey data, which is now almost 6 years out of date. In addition, 2012 data reflects conditions with much lower traffic due to low snowfall and less development in the Tahoe area. The analysis also relies on 2006 Caltrans data for Highway 89; data that is nearly 12 years out of date. Anecdotally, residents and visitors to the area have seen substantially worse winter and summer traffic conditions on Highway 89 in the last 10 years. The traffic analysis applies adjustment factors to these numbers, but these seem low. For example a 1.02 adjustment factor to the 2006 Caltrans data seems very low. Furthermore, roadways have been altered since that time, including the new bridge, traffic signal, and lane structure at the intersection of Alpine Meadows Road and Highway 89. Given all these factors, the basis for impact determinations for traffic does not seem to be well substantiated and arbitrary.

And while it is not a Placer County designation, the Caltrans limit of LOS E for Highway 89 is clearly bad for the community, residents, and visitors. If we accept LOS E then we effectively accept that our roadways cannot serve the community. Approval of additional projects will add more traffic to these roadways, which just compounds the situation and the County is failing at achieving Goal 3A of the Placer County General Plan. F19-8

The County should give careful and meaningful consideration to whether it chooses to approve the project with a single access/egress point. As stated in the DEIR, the Placer County Zoning ordinance states that more than one access/egress point is required unless Placer County determines otherwise. In light of recent fires in Napa and Sonoma County, and the high risk of dangerous wildfires in the Sierra, the County must ensure the long-term, adequate safety of residents for all projects approved. A review of fire safety and evacuation protocols will likely be forthcoming following the Napa and Sonoma fires, and these lessons must be applied here, and especially when contemplating new development that should meet the highest standards. F19-9

The project also includes two permanent easements for possible future emergency access through US Forest Service land. The "future" when this could be achieved is not known or defined, and it is therefore conceivable that access would be granted in the near term. These emergency access/egress routes therefore are part of the proposed project and the impacts that may arise from them must be evaluated in the EIR, including off-site impacts resulting from connection of these easements to adjoining roadways.

Furthermore, while we recognize the public safety interest in securing secondary access/egress routes, if the project is approved, there must be assurance that these easements exist only for purposes of emergency access. Access through adjacent neighborhoods has been a highly contentious issue in the development of the proposed project, as noted in the EIR discussion of the Bear Creek Association denial of access through their property, and therefore at no point in the future should the developer or the future Alpine Sierra HOA be able to convert these access/egress routes to normal, non-emergency access routes. F19-10

On page 7-11 the DEIR states it is assumed most residences would be second homes and therefore generate fewer trips. While this is true in the aggregate, these uses generate more trips during weekend and holiday peak hours, which are the most heavily impacted periods for LOS of area roadways and intersections. F19-11

Mitigation Measures

Mitigation measures throughout the DEIR are flawed and inadequate. As examples, I reference the following:

- MM 7.4c – This measure requires preparation of a Construction Traffic Management Plan, which has as its "goal" is to reduce impacts. The MM lists many components of the plan, such as truck trips per day, arrival and departure times, but the performance standards listed do not address any of these issues. How can we be sure that the traffic plan will adequately mitigate these impacts. F19-12

- Air Quality – why is the requirement to submit a Construction Emission/Dust Control Plan not listed as a mitigation measure? This would seem to indicate that such a plan is ministerial, which would seem to indicate that other plans submitted to the County are discretionary and therefore subject to individual judgment as to the requirements. F19-13
- MM12.2a – Why is proof of implementation provide on request? Why isn't there a requirement to submit monitoring and reporting of implementation and effectiveness. Is the burden of enforcement is on neighbors who may notice something and report it to County? F19-14

- MM 12.3b-This measure limits drainage into Bear Creek at no more than 2 cfs, but how is this measured and enforced. Maintenance required but no mechanism to ensure compliance and no monitoring identified. F19-15
- MM 6.1a - Is a 100 foot setback from an active nest adequate to ensure no take of yellow warblers, especially given the nature of required work on such a rocky site (for example, California Public Utility Commission recommended 150 ft setback in their Nesting Management Plan 2015 for Yellow warbler). And how will this be enforced given that most lots will be custom builds? F19-16
- MM6.1b - Who is responsible for ensuring bat surveys are conducted. Are these implemented and overseen by Placer County as part of development permit? F19-17
- MM6.2 - This MM states that bridges, where feasible, shall avoid fill. How are we to determine if this impact is fully and successfully mitigated if it is written such that fill may occur, and the effects of that fill cannot be known at present. F19-18
- MM6.2b – This MM requires a Riparian protection plan for which there are no performance standards or other metrics to ensure that the plan is effective at mitigation of impacts. F19-19
- MM6.4a – This MM is poorly written. I assume that "permits" referenced in this MM refer to ACOE Section 404 permit and Section 401 water quality certification, and any enforceable conditions of the 404/401 must also be conditions of the development plan. F19-20

As the public, are we to just trust that plans submitted to the County will adequately mitigate impacts without knowing anything about these plans. And is approval of these ministerial and subject to specific criteria or performance standards, or is approval discretionary by the County and therefore subject to wide latitude and variation in the quality of the plan and the requirements? Where are the monitoring components for these mitigations? And how will these plans carry over and be implemented and enforced for individual construction of residences that may occur over a possible 20 year construction period? How is the public or the County to know that these mitigation measures adequately mitigate the potential impacts of the project, and how can the County certify the EIR based on measures that do not support their determination? F19-21

Chapter 14 - Public Services
The ASCWD 1998 Water Audit is nearly 20 years old. Does this data reflect current water use in the valley? F19-22

Chapter 15 Cumulative Impacts
There are a number of projects missing from the cumulative impact section. The White Wolf development is principle among these. While an application has not been submitted for the White Wolf development, the project has been actively under consideration and development for years, including extensive coordination with KSL Corporation, joint presentations by KSL and Mr. Caldwell of White Wolf, installation of lift towers, and concept plan submittal to Placer County. This seems to be a reasonably foreseeable project. F19-23

In addition, the White Wolf project is in the same area as the Alpine Sierra development such that nexus of cumulative considerations is substantial. To omit from this analysis and have the project proceed would substantially harm the quality of the analysis and would do a disservice to the public and the decision makers. F19-24

Also missing from the cumulative section are the Gasex exploder avalanche devices currently being installed on the slope between Squaw Valley and Alpine Meadows Road, replacement of the bridge at Alpine Meadows Road and Highway 89 last year, and the many other, smaller projects for ongoing operation and maintenance of the Alpine Meadows Resort (e.g., Gasex exploders at the Alpine Ski resort).

It must be noted that most of these projects, plus the others already noted such as the gondola, replacement of the Hot Wheels lift, and the Stanford Chalet project, are concentrated in the upper portion of the Alpine Meadows valley. As such, many of the localized cumulative impacts would also be concentrated in this area. For example, impacts to the visual resources of the upper valley are substantially understated in the F19-25

Response to Comment Letter F19

Dean Amundson
November 3, 2017

F19-1 The commenter states that the dependence on the 1968 Alpine Meadows General Plan is flawed because it is almost 50 years old, predates virtually all development, predates CEQA, and longer reflects any of the vision or objectives for development in the Alpine Valley. The commenter states that it is a disservice to the residents and visitors to use this as a basis for compatibility.

CEQA requires that the EIR consider the project's consistency with adopted planning and policy documents, thus it is appropriate to include consideration of the Alpine Meadows General Plan. The Draft EIR also considers the project's consistency with more recent planning and development standard documents, such as the Placer County General Plan, the County's Land Development Manual and the County's Stormwater Management Plan.

F19-2 The comment states that the County should not considered the largest development in decades based on an old General Plan. The commenter notes that the proposed development at the base of Squaw Valley required a new specific plan and that the effects of this development is spilling over into the Alpine Meadows valley.

Refer to response to comment F19-1 regarding consideration of the Alpine Meadows General Plan. A specific plan is typically prepared for a much larger project site and proposed development than the Alpine Sierra Subdivision.

F19-3 The comment states that the Draft EIR fails to consider impacts to users of existing U.S. Forest Service trail, who will be significantly impacted by the proposed project as it is heavily used and users expect high visual quality. The comment highlights a loops that extends onto the property where there is a scenic view of the valley and the hillside above Alpine Meadows Road.

Please refer to Master Response 1, Existing and Proposed Trail.

F19-4 The comment questions how the surrounding residents and visitors will know that the proposed residential units will be visually compatible with surrounding areas and not present a uniquely uncharacteristic visual effect; the commenter states that, as the project proposes its own design committee, the project will not be subject to the same standards.

Please refer to Master Response 2 regarding the visibility of the proposed homes from neighboring subdivisions. Designs for each individual home would be required to be consistent with the proposed Architecture Handbook provided in Draft EIR Appendix B3.

F19-5 The comment questions how Mitigation Measure 5.3a will ensure that there are no adverse lighting impacts on adjacent properties. The commenter states that the Dark Sky Society standards are aimed more at the night sky and not towards downhill adjacent properties.

Please refer to Master Response 2 regarding lighting impacts to neighboring subdivisions.

F19-6 The comment states that the EIR needs to provide a photo of existing conditions for comparative purposes to Figure 5-4.

As discussed in Master Response 2, Figure 5-4A has been added to the EIR to show existing visual conditions.

F19-7 The comment states that the project is not infill and is bounded by a significant portion of U. S. Forest Service land; additionally, the comment states that the site is used by bears going between the U. S. Forest Service land and Bear Creek. The commenter questions how sedimentation and other indirect effects will affect the yellow-legged frog downstream.

Please refer to Master Response 3, Biological Resources, and Master Response 7, Hydrology and Water Quality.

F19-8 The comment states that the traffic impact analysis is flawed because it is based on 2012 traffic data collected on a single day during a low snow year, and uses Caltrans data from 2006. Additionally, the comment states that the data was manipulated through adjustment factors and doesn't include recent alterations to roadways. Finally, the comment states that the level of service E for State Route 89 is bad for the community and fails to satisfy Goal 3A of the General Plan.

Please refer to Master Response 4, Traffic, regarding the methodology and validity of the traffic impact analysis.

F19-9 The comment states that the County should give careful and meaningful consideration to the project's single access point, especially in light of the high fire risk are and the Napa/Sonoma fires from 2017.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F19-10 The comment states that the two permanent emergency access easements through the U.S. Forest Service land must be evaluated in the EIR, including off-site impacts resulting from connection of these easements to adjoining roadways. Additionally, the comment states that there must be assurance that these easements exist only for purposes of emergency access, as assess through adjacent neighborhoods is highly contentious.

The U.S. Forest Service has not agreed to allow construction of public roadways or emergency access roadways on these easements, thus no use of the easements is assumed as part of the proposed project and the EIR does not need to evaluate use of the easements.

F19-11 The commenter states that while they agree that second homes create fewer trips overall, they create trips during weekends and holidays when the roads are more likely to be impacted.

Please refer to Master Response 4, Traffic.

F19-12 The comment states Mitigation Measure 7.4c identifies components of the required Construction Traffic Management Plan but does not include any performance standards for this plan.

Mitigation Measure 7.4c includes the following performance standards that the Construction Management Plan must achieve:

- Delivery trucks shall not idle/stage within the public right-of-way.
- Any proposed lane closures on Alpine Meadows Road shall be reviewed and approved by the Department of Public Works and Facilities at a minimum of one week prior to the proposed lane closure.
- All construction employees shall park on site.
- Roadways shall be maintained clear of debris (such as rocks) that could otherwise impede travel and impact public safety.

F19-13 The comment questions why the Construction Emission/Dust Control Plan not listed as a mitigation measure. The comment states that this seems to suggest that the plan is ministerial whereas the others are discretionary.

The Construction Emission/Dust Control Plan is required under Mitigation Measures 11.2a and 11.4c. Dust control measures are also required under Mitigation Measure 11.4d.

F19-14 The comment suggests that the project developer should be required to submit proof of implementation, monitoring, and effectiveness of the requirements under Mitigation Measure 12.2a so that the burden of enforcement is not on the neighbors.

Please refer to Master Response 2 regarding the use of Improvement Plans to ensure compliance with various mitigation measures.

F19-15 The comment questions how the limit on increased runoff to Bear Creek identified in Mitigation Measure 12.3b will be monitored and enforced, including any necessary maintenance.

The County would verify compliance with this requirement in their review of the Final Drainage Report required under Mitigation Measure 12.1b.

F19-16 The comment questions if the 100-foot setback required under Mitigation Measure 6.1a is adequate for ensuring the nesting of yellow warblers in such a rocky area, noting that the California Public Utility Commission uses a 150-foot setback. The comment questions how the proposed setback will be enforced.

Page 6-15 of the Draft EIR states that it is expected that all of the "riparian thickets within the site that have sufficient width to provide visual cover would provide suitable foraging and nesting habitat for this bird," and that "the very small proportion of riparian vegetation that would be lost as a result of the project is considered to be a less-than-significant impact on yellow warbler because sufficient riparian vegetation would remain on-site to support local populations of this species." This conclusion is not dependent on the 100-foot stream setback required under Mitigation Measure 6.1a. Further, it is expected that the potential to disturb nesting activity would be limited to the construction period.

F19-17 The comment questions who is responsible for ensuring that the bat surveys required under Mitigation Measure 6.1b are completed.

Please refer to Master Response 3, Biological Resources, regarding the implementation of mitigation measures.

F19-18 In reference to Mitigation Measure 6.2a, the comment questions how the EIR can evaluate the impacts of and ensure mitigation for any wetland fill that may be necessary to construct the proposed bridges.

Please refer to Master Response 3, Biological Resources, regarding the implementation of mitigation measures.

F19-19 The comment states that Mitigation Measure 6.2b does not include any performance standards that guarantee its effectiveness.

Please refer to Master Response 3, Biological Resources, regarding the implementation of mitigation measures.

F19-20 The comment states that Mitigation Measure 6.4a is poorly written and it is assumed that the permits mentioned in this measure refer to the permits required under section 401 and 404 of the Clean Water Act. The comment states that any enforceable conditions of these permits must also be conditions of the development plan.

Please refer to Master Response 3, Biological Resources, regarding the implementation of mitigation measures.

F19-21 The comment questions if the public is to trust the plans submitted to the County without seeing them and if approval of those plans is subject to specific criteria or performance standards. The comment questions the monitoring components of the mitigations and how they will by carried over, implemented, and enforced for individual lot construction over the 20 year construction period. Finally, the comment questions how the public or County is to know the effectiveness of the mitigation measures and how the County can certify the EIR based on measures that do not support their determination.

Please refer to Master Response 2, Visual Resources, regarding the implementation of mitigation measures that rely on submittal of Improvement Plans. The approach described in that discussion also applies to other plans that the project developer would be required to submit. The County must approve all such plans prior to issuance of grading and/or building permits.

F19-22 The comment states that the Alpine Springs County Water District 1998 Water Audit is nearly 20 years old and questions if the data reflects current water use in the valley.

In addition to the Water Audit, the Draft EIR analysis of water supply is based on the Proposed Alpine Sierra Development Water & Sewer Facility Evaluation technical memorandum provided in Appendix K. This evaluation uses the most recent data available to evaluate the project's impacts on water supply.

F19-23 The comment states that the White Wolf development, though not officially submitted, has been under consideration and development for years and is thus a reasonably foreseeably project.

Please refer to Master Response 12, Cumulative Scenario.

F19-24 The comment states that White Wolf, which is in the same area as Alpine Sierra, is excluded from the cumulative analysis and its exclusion is a substantial disservice to decision makers and the public.

Please refer to Master Response 12, Cumulative Scenario.

F19-25 The comment states that the cumulative analysis is missing the Gasex exploder avalanche devices currently being installed on the slope between Squaw Valley and Alpine Meadows Road, replacement of the bridge at Alpine Meadows Road and Highway 89 last year, and the many other, smaller projects for ongoing operation and maintenance of the Alpine Meadows Resort. Additionally, the comment states that most of these projects will occur in the upper valley and thus the impacts to visual impacts are understated in the Draft EIR.

Please refer to Master Response 12, Cumulative Scenario.

Comment Letter F20

November 3rd, 2017

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. My wife and I have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F20-1

The analysis also assumes that a majority of the houses will be "recreational homes," which have "relatively low" traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F20-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F20-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F20-4

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F20-5

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example, Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality. F20-6
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

This analysis also does not address the visual impact from houses along John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level. F20-7

Biological resources

Special-status Species

The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described. F20-8

The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is **not** development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter. F20-9

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F20-10

Defensible Space

How is it possible to due defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F20-11

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F20-12

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F20-13

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each home site for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of storm water generated by individual home sites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F20-14

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River?

My wife and I hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region. F20-15

Sincerely,

Ryan Carlson

Melissa Winn

2140 John Scott Trail

Response to Comment Letter F20

Ryan Carlson and Melissa Winn
November 3, 2017

F20-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F20-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F20-3 The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F20-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F20-5 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter in Place strategy.

F20-6 The comment states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F20-7 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivision.

F20-8 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other

mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources, regarding the effect of Mitigation Measure 6.5a on construction activities and response to comment F3-9 regarding the potential effects of a lengthened construction period.

F20-9 The comment references the biological resources assessment (Appendix D of the Draft EIR) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources.

F20-10 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F20-11 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, in regards to the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F20-12 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level

estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F20-13 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F20-14 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F20-15 The comment questions whether an evaluation has been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

Comment Letter F21

November 3, 2017

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Alex Fisch:

As a homeowner in Alpine Meadows Bear Creek for 53 years, I am deeply concerned that critical concerns that have been submitted by homeowners of Alpine Meadows to Placer County in terms of this DEIR are not only not addressed but the county seems to be evaluating the project as if it is December 2010.. There is no consideration of the fact that there are multiple pending developments that will span 25 years of construction which will cause exponential changes in infrastructure, environmental and social conditions of this area. F21-1

TRAFFIC continues to be a growing issue with the county using outdated data that does not reflect the proposed developments of White Wolf and the Stanford development across the road that in total will add a minimum of 76. new homes. In the winter months, It now takes approximately 2 hours to drive from Truckee to Alpine Lodge. The drive from AM Lodge to Tahoe City is 1.5 hours. More analysis must be done to ascertain how much development is appropriate in Alpine Meadows. F21-2

FIRE is on all our minds given what just happened in Northern California. The annual fire season has grown from 138 days to 222 days in California. Alpine Meadows is a high risk forested area. Alpine has been advised by fire professionals that it is no longer "if" we will have a major fire but "when" the fire will occur. How are residents to escape from a fire with one road access. This was a catastrophic issue in the Napa and Sonoma fires. One of the causes cited by fire professionals in Napa and Sonoma was the over building of homes in high risk fire areas. F21-3

The cumulative impacts of Squaw Valley developments, White Wolf, the gondola, and Stanford projects must be adequately addressed in this DEIR. This includes water issues, traffic, 20 year on-going construction noise , forest fire potential, and the lack of meaningful emergency preparedness plans. F21-4

Sincerely,

Elise Duncan
2030 Big John Road Alpine Meadows, CA

Response to Comment Letter F21

Elise Duncan
November 3, 2017

F21-1 The comment provides introductory remarks and states that the Draft EIR does not consider the multiple pending developments that will span 25 years of construction, causing infrastructure, environmental and social changes.

Please refer to Master Response 12, Cumulative Scenario.

F21-2 The comment states that traffic is an increasing issue, the County has been using outdated data, the Draft EIR does not include the White Wolf and the Stanford developments, and more analysis is needed. The comment states that during winter it takes 2 hours to drive from Truckee to Alpine Lodge and 1.5 hours from Alpine Meadows Lodge to Tahoe City.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F21-3 The comment states that Alpine Meadows is a high fire risk area and the annual fire season has grown from 138 days to 222 days, and that fire professionals have told residents that it's only a matter of time until a major fire will occur.

Please refer to Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F21-4 The comment states that the cumulative impact from Squaw Valley developments, White Wolf, the gondola, and Stanford projects must be adequately addressed, which includes water issues, traffic, 20 year on-going construction noise, forest fire potential, and the lack of meaningful emergency preparedness plans.

Please refer to Master Response 4, Traffic, Master Response 6, Noise, Master Response 9, Fuel Management and Fire Safety, Master Response 10, Shelter-in-Place, and Master Response 12, Cumulative Scenario.

Comment Letter F22

Shirlee Herrington

From: Pete Geffen <petetbs@sbcglobal.net>
Sent: Friday, November 03, 2017 11:33 AM
To: Placer County Environmental Coordination Services
Cc: Elaine Geffen
Subject: PROPOSED PROJECT: Alpine Sierra Subdivision (PSUB 20130004)

Dear Placer County,

This is a comment on the above PROPOSED PROJECT: Alpine Sierra Subdivision (PSUB 20130004). There are many concerns with this project that have been voiced elsewhere. As our house on John Scott Trail is quite close to the proposed development, I'll focus on some of those relevant to our proximity. In this latest version of the developer's proposal, they have increased the density of the units and the length of time of the construction phase. This would increase the intensity and duration of noise pollution and other quality of life issues, such as construction traffic and the diminution of the natural beauty of the area. Add to this the other proposed new projects in the valley, and I feel the developer needs to limit the density and duration of his project. F22-1 F22-2

Sincerely, Pete Geffen

Response to Comment Letter F22

Pete Geffen
November 3, 2017

F22-1 The comment states that the commenter lives on John Scott Trail, which is close to the proposed project. The comment states that the density of units and the length of the construction phase has been increased compared to prior development proposals for this site. The comment expresses concern that this would increase the intensity and duration of noise pollution and other quality of life issues, such as construction traffic and diminishment of the area's natural beauty.

Please refer to Master Response 2, Visual Resources, Master Response 4, Traffic, and Master Response 6, Noise.

F22-2 The comment states that with the other proposed projects in the valley, the developer needs to limit the density and duration of the project.

The comment does not identify any inadequacies or inaccuracies in the Draft EIR, thus no response is required. Please refer to Master Response 12, Cumulative Scenario, and Master Response 13, Alternatives.

Comment Letter F23

November 3, 2017
Shirlee Herrington
Placer County Environmental Coordination Services Division
3091 County Center Drive
Auburn, Ca 95603

Re: Draft EIR for Alpine Sierra Subdivision

To whom it may concern,

I would like to submit my concerns regarding the proposed development (Alpine Sierra Subdivision) located in Alpine Meadows, Ca. Although my concerns extend to the entirety of the project I'd like to highlight the following aspects as they are significant.

This proposal at its present state would be in violation of Placer County zoning code 17.54.100.C.1.d. which requires that all residential developments have two access points for emergency services. It would also violate the allowable length of a dead end road, much past the 800 ft threshold. Given that this proposed project exists within an area designated as extremely high wildfire danger, as well as a known avalanche path it would be far from prudent for the County to allow a waiver of the designated codes. At this given time, many residents of the Alpine/Tahoe region are unable to obtain fire insurance for their homes, if the insurance companies have identified

F23-1

a significant risk, and the County itself has passed regulations with which to govern such development, I fail to see the wisdom in granting any such exceptions. Recent events in California have brought to the forefront the costs of such risks, as deadly wildfires have become more and more common. Natural disasters in other realms, such as the recent effects of hurricanes in the area of Houston, has laid clear the risks associated with lax or non existent zoning laws, risks that can have cumulative effects on the entire community. Fortunately Placer county has created these laws to guard against such disasters, I can see no logical reason why this project should be excepted from these well thought out rules. The draft EIR, seems to suggest that these risks could be mitigated to Less than Significant by an additional fire truck and a safe shelter, although once again I believe the recent fires in Sonoma have made clear that there is no such thing as a true shelter from out of control wildfires. I believe this is an inadequate finding by the draft EIR that should be studied further. I also strongly believe that it would be a dereliction of duty by those in the county who are charged as stewards of public safety to allow this project to continue in violation of County standards. It is my opinion that the County needs to reject the location of the

F23-1 Cont.

East parcel as unsafe and in violation of present standards. F23-1 Cont.

In my reading of the proposal there is nothing that will provide any tangible benefit to the community that would be fitting of any such exceptions to present law. The builder highlights the need for housing within "walking" distance from the ski area. This would surely not provide this as the distance would be far too great. The builder also makes the claim that this development would provide much needed housing stock for the area. While it is true that the region is currently in an affordable housing crisis, this project proposes to build no such housing. There is already a surplus of large luxury homes not just in Alpine Meadows but the region as a whole. What Tahoe simply doesn't lack is luxury housing, it is affordable housing that is in short supply, this project only exasperates the current situation. Secondarily this project proposes to construct what will surely be marketed as second homes. As a current resident of Alpine Meadow, there is little to me that suggests the construction of homes that I will aspire to buy in the future. As a full time resident I have no desire for "amenities" shared facilities, pools etc., these will be perks for vacationers, not something that residents such as F23-2

myself will hope to move into some day. Not only does this project fail to provide affordable housing, it fails to fit the genuine needs of the residents. In this light it could also be in violation of Goal 1.A of the Placer County General Plan. For this reason I see no benefits that would be fitting as to provide any kind of reasoning for the alteration of the requirements of the zoning code in regards to safety.

F23-2 Cont.

The developer submits mitigating methods that they contend would reduce, but of course not eliminate, the fire hazard. I question the finding of the EIR that these mitigations would truly bring all of effects to Less than Significant. I also have grave doubts as to how such fuel reductions and extensive defensible space could be achieved without corresponding and unacceptably Significant impacts on visual resources. Once again the bulk of my concerns surround the proposed East Parcel of the project.

F23-3

I find difficulty in resolving the simultaneous claims by the applicant that extensive forest clearing will be done with an eye towards fire safety, without significantly harming the visual qualities of the site, particularly as viewed from the very valuable and popular resource that is the Five Lakes Trail, and the surrounding Granite Chief Wilderness. The builder also makes claim that the

construction and design of the proposal will minimize negative impacts by implementing the usage of earth tones, guardrails, and setbacks of the houses, yet one of the explicitly stated objective of the project is to "maximize the market, by optimizing views." How, logically can a home both optimize the view from the building site, while simultaneously minimizing its impact from sensitive areas? A general rule of thumb is, if you have a great view, you can be seen from just as far. It seems impossible to me have it both ways. While there is development currently adjacent to the East Parcel (Bear Creek), the majority of these home sites are located in the immediate depression of Bear Creek, and are for the most part, concealed from the surrounding vistas. The express point of this development is to utilize the high points in order to "maximize the market potential."

The draft EIR spends a great deal on the impacts of the actual construction process, the building of the homes, and the storage of construction, but it fails to adequately address the impacts of the final development. The suggestion that the aforementioned mitigations could reduce these visual impacts to Less than Significant is flawed and needs to be further addressed particularly its relation to

F23-3
Cont.

Goals 1.A, 1.K of the Placer County General Plan. The East Parcel of this project does not meet this criteria. F23-3 Cont.

In the past Placer County has taken a strategy of seeking development on previously built lands, this could not be further from the scope of this proposal. This project proposes to build a long dead end road, in violation of present standards, and create an island of development within what is now pristine forest. I am of the opinion that this proposal also violates the spirit of objective 4, within the Alpine Meadows General Plan, in which it will prematurely subdivide a large swath of previously undisturbed forest, for a project of unproven need. It should be noted that this proposal has been raised previously and abandoned due to lack of resources and consumer demand. The risk of this project is to irreparably harm, the visual and biological resources, for something that cannot be guaranteed completion. I move for the County to reject this proposal, particularly the East Parcel, and seek out further development in areas already of disturbed nature. F23-4

My final concern hinges on said biological resources. Not only has this site been identified as potential habitat for protected species, it is also a rich habitat for more standard wildlife. The draft EIR, addresses concerns with F23-5

protecting nesting species of sensitive birds, however I feel that the response is inadequate. The mitigation would involve the observation of nesting birds, and subsequently protecting them if found. However, the protocol would entail the observation of wildlife to occur along the same timeline as construction. I am concerned that these timelines, which mirror the patterns of the birds, would allow for adequate time for nesting birds to take up residence before the beginning of construction for the season. The timeline seems to allow the beginning of work for the season to begin prior to the nesting time of these protected species. I believe that the draft EIR fails to address the fact that the presence of active work on the site will discourage such protected species to take up residence in the first place. To protect these species after the fact might have little true mitigating effect. F23-5 Cont.

Although in the grand scheme of things the acreage of the project may seem small, it should be viewed biologically within the present developed nature of the area. Primarily my concern surrounds the loss of valuable black bear foraging habitat. Alpine Meadows has for some time been dealing with a major conflict of humans and aggressive black bears. Development has forced these bears into contact with the surrounding community and has F23-6

resulted in a great deal of property damage as a result of such aggressive and destructive bears. In this year alone, I have had the door handle ripped off my car, and virtually all of my surrounding neighbors have had windows smashed, doors broken down, etc. In no way does this document address how the loss of such habitat will certainly only prove to increase such human/wildlife interactions, and only result in more damage and loss of property. To take away natural habitat will only force such bears to further seek food in developed areas. The Alpine Meadows community is at present at a critical juncture, this proposed development will not only prove to make it worse, within the site of new development, but to the existing homeowners. How will the developer address the concerns of those already residing in the Alpine Meadows? This is not addressed in the EIR at all. The final EIR, should be required that the effects of non protected species be taken into consideration in regards to their habitat and its relationship with the present community.

F23-6 Cont.

The East Parcel of this proposed project relies on a cutoff island of development within a pristine forest area. The development is slated to be located far from existing roads and will require an enormous amount of disruption in order to gain access to the site. This simply does not

F23-7

meet the requirements of environmentally sensitive and responsible development as outlined as goals in the Placer County General Plan. I urge the County to conduct a more comprehensive EIR, and to consider alternatives that would eliminate the Eastern Parcel of this project.

F23-7 Cont.

Thank You for Your Consideration on this Matter,

Andrew Hays
1529 Mineral Springs Trl
Alpine Meadows, CA 96146

Response to Comment Letter F23

Andrew Hays
November 3, 2017

F23-1 The comment provides introductory remarks and states the proposed project would violate zoning code section 17.54.100.c.1.d. which requires two points of access and establishes the maximum allowable length of a dead end road. The comment states that the County should require compliance with these standards due to wildfire and avalanche risks. The comment states that the shelter-in-place and the additional fire truck are not sufficient mitigation. In addition, the comment states that the County should prohibit development of the eastern portion of the site due to safety risks and violation of development standards.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, Master Response 11, Avalanche Hazards, and Master Response 13, Alternatives.

F23-2 The comment states that the proposed project does not provide a tangible benefit to the community that would excuse the exceptions to present law and zoning. The comment states that the proposed project is too far to walk to the ski area, the type of homes to be built will not satisfy the (affordable) housing shortage, the constructed homes will be marketed as second homes, and the project fails to fit the genuine needs of the residents.

Please refer to Master Response 14, Project Merits.

F23-3 The comment questions how the fire safety measures (fuel reductions and defensible space) can be achieved without significant visual impacts, particularly from Five Lake Trail and the Granite Chief Wilderness. The comment questions how the project can both optimize views and minimize visual impacts. The comment states that the analysis of the visual impacts is flawed and should be redone, particularly its relation to Goals 1.A, 1.K of the Placer County General Plan, as the East Parcel of the project does not meet the criteria.

Please refer to Master Response 2, Visual Resources, regarding the methodology for reflecting the defensible space requirements in the visual simulation and the visual impacts to neighboring subdivisions.

F23-4 The comment states that the proposed project will violate the spirit of Objective 4 of the Alpine Meadows General Plan and leads away from the County's previous strategy of seeking development on previously built lands. The comment also states

that the proposed project was previously abandoned due to lack of resources and consumer demand. The comment asks that the County reject the proposal because of its unproven need and risk of irreparable harm to biological and visual resources.

Please refer to Master Response 2, Visual Resources, Master Response 3, Biological Resources, and Master Response 14, Project Merits.

F23-5 The comment states that the mitigation measure for nesting birds is inadequate as it allows construction to begin before the nesting season begins. The commenter states that the Draft EIR should address the fact that construction will discourage the residence of protected species.

Please refer to Master Response 3, Biological Resources.

F23-6 The commenter states that the project would result in the loss of black bear foraging habitat and development would result in increased human/bear conflicts and damage and loss of property. The comment states that these concerns regarding non-protected species and their habitat should be addressed in the Draft EIR.

Please refer to Master Response 3, Biological Resources.

F23-7 The comment states that the east parcel will be cutoff within the pristine forest and will require extensive construction in order to gain access. The comment also states that the project does not meet the requirements of environmentally sensitive and responsible development as outlined as goals in the Placer County General Plan; and the County needs to conduct a more comprehensive EIR and consider an alternative that eliminates the Eastern parcel.

Please refer to Master Response 13, Alternatives. The effects of the construction required to provide access to the eastern portion of the project site are evaluated throughout the Draft EIR.

November 3, 2017

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

Re: Comments on the Draft Environmental Impact Report (EIR) for the Alpine Sierra Development

Dear Mr. Alex Fisch:

I have reviewed the draft EIR for the Alpine Sierra Subdivision Project in Alpine Meadows and, frankly, it appears to be inadequate to Placer County's obligations under the California Environmental Quality Act.

Toward generating a full discussion of the potential merits and problems this development entails, I find the draft EIR fails in its mandated charter to adequately address 3 key issues that are integral to the future of both Alpine Meadows as a residential and ski area as well as the surrounding and greater Tahoe Basin. F24-1

I do not see any significant and current studies have been performed to address and potentially mitigate the great fire danger in the project area. From the first proposal of this project in 2005, there has been woeful disregard for how a fire would be handled in light of two critical facts: 1) ingress and egress from the project site; and 2) an evacuation and traffic study addressing a fire event involving both the Alpine Meadows Road and Highway 89, the sole route out of the greater area. This project has never adequately addressed the issue of an egress from the site. Neither issue has been adequately responded to in the draft EIR and it is a critical and arguably project denying issue. F24-2

Two, it is my belief the draft fails to address, in any substantive manner, the issue of water supply in the valley. To date, I cannot see that a formal study of the water source and forecast of future demand and supply has been performed. This is critical as this project proposes to add such a great number of users to the current demand. No certified water engineering studies have been performed and Alpine Water District has only performed informal water projections to date. This is a serious oversight on the part of Placer County. It must become a part of the EIR. F24-3

A final glaring omission in the draft EIR is the matter of traffic and safety at the project access to Alpine Meadows Road. I see no mention of the proposed White Wolf development with a proposal of 150 parking spaces in that project area and access point to AM Road all within 150 feet of the White Wolf site egress. This represents a major traffic inflow in peak hours and certainly in the event of a evacuation from the valley in winter or summer. This issue is not detailed in the draft EIR. Clearly, the to-date traffic studies submitted by the AS project are superficial and inadequate to the importance of this major traffic artery. F24-4

The residents of Alpine Maadows and the citizens of the greater Tahoe Basin as well as all Californians will be well served if the EIR for this project more accurately and fully addressed the key issues entailed in this proposed development. It is clear the resources have not been expended to fully address the very real impacts this project portends. At this stage, I respectfully request that Placer County require the developer to more fully address these key issues as well as the issues raised by myself and many others regarding this project. F24-5

Thank you in advance for your response to the above concerns and requests.

Sincerely,

Leo E. Heagerty
2030 Big John Road
Alpine Meadows, CA 96145

Mailing Address:
203 Gibson Ave.
Mill Valley, CA 94941

Response to Comment Letter F24

Leo E. Heagerty
November 3, 2017

F24-1 This comment provides introductory remarks.

The comment does not identify any inaccuracies or inadequacies in the Draft EIR and no response is required.

F24-2 The comment states that the Draft EIR does not include any significant and current fire danger studies and disregards ingress and egress from the project site and an evacuation and traffic study.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F24-3 The comment states that the Draft EIR does not address water supply to the valley because there is no formal study of the water source and forecast of future demand and supply or a certified water engineering study.

The Draft EIR analysis of water supply is based on the Proposed Alpine Sierra Development Water & Sewer Facility Evaluation technical memorandum provided in Draft EIR Appendix K. This evaluation uses the most recent data available to evaluate the project's impacts on water supply.

F24-4 The comment states that the Draft EIR does not address traffic and safety at the project access to Alpine Meadows Road and does not consider the 150 parking spaces proposed within the White Wolf development and its impact on traffic on Alpine Meadows Road. The comment states that the traffic studies are superficial and inadequate.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario. The White Wolf site is currently used as overflow parking for the Alpine Meadows ski area, thus the 150 parking spaces would not represent a change from existing conditions.

F24-5 The comment states that Placer County should require that the Draft EIR should more accurately and fully address the issues.

The comment does not identify any specific inaccuracies or inadequacies in the Draft EIR, thus no response is required.

Comment Letter F25

Shirlee Herrington

From: Aramie McDonald <aramie123@yahoo.com>
Sent: Friday, November 03, 2017 3:26 PM
To: Placer County Environmental Coordination Services
Subject: Comments on DEIR report for Alpine Sierra Subdivision

To: Placer County Community Development Resource Agency

As long-time second home-owners at Alpine Meadows, we would like to submit comments on the draft Environmental Report.

It is absurd that the traffic study in the draft report is based on a sunday in March of a low snow year. The reality is that in peak February 2017 weekends with snow, it took an hour to drive from Alpine Meadows to Squaw Valley on a Saturday morning. Some of this was due to total gridlock from the Squaw Valley traffic light, which was backed up to the Alpine Meadows light, making it in nearly impossible for cars to leave Alpine Meadows Rd and turn left onto Hwy 89. This was not a phenomena limited to the holiday weeks and weekends; this occurred every single weekend of the season until April.
This also presents safety concerns, as emergency services are subject to the same delays.

Additionally, the 52 new dwellings would easily add 100 cars to Alpine Meadows Rd on a busy weekend, not including extra guests, or additional car trips by service providers (housekeepers, maintenance etc.) While these visitors would likely ski at Alpine Meadows, they will still be driving into town for basic services (e.g. groceries), adding more traffic to the area. F25-1

The plan also fails to consider the cumulative traffic impact of other proposed development projects at Alpine Meadows (White Wolf) F25-2

Regarding summer traffic, we do not see any plans to add safe bicycle and pedestrian routes to Alpine Meadows Road. This would be welcomed as the area continues to get busier, as there is currently no safe way from Alpine Meadows to 89 other than driving. Any increase in traffic on Alpine Meadows Rd represents a safety risk, due to the lack of a shoulder and low visibility of pedestrians, cyclists, and equestrian users against a forested background. F25-3

We hope you will seriously reconsider the potential traffic impact of this proposed project.

Respectfully,

Aramie and Kevin McDonald

Response to Comment Letter F25

Aramie and Kevin McDonald
November 3, 2017

F25-1 The comment states that the traffic study data is insufficient because it is based on traffic data collected on a Sunday in March during a low snow year and this data does not match actual conditions. The comment states that the level of traffic congestion also presents safety concerns because emergency services are subject to the same delays. The commenter also states that the proposed project would add 100 cars to Alpine Meadows Road that would still drive to town for basic services.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation. The traffic impacts analysis considers the likely destination of project-generated traffic, including trips made outside of the Alpine Meadows valley.

F25-2 The comment states that the Draft EIR does not include any other proposed development projects (i.e., White Wolf) in the cumulative traffic analysis.

Please refer to the discussion of the cumulative traffic impacts analysis in Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F25-3 The comment states that the proposed project should include the addition of bicycle and pedestrian routes to Alpine Meadows Road as there is no other safe way from the site to State Route 89 other than driving. The commenter states that any increase in traffic on Alpine Meadows Road is a safety risk.

Please refer to Master Response 4 regarding traffic. The Draft EIR states "due to the rural nature of the project site, no dedicated bike lanes are provided. However, both Alternative A and Alternative B would include a public pedestrian trail on site." Moreover, existing general plan policies and county code do not require or anticipate construction of pedestrian or bicycle facilities on Alpine Meadows Road.

November 3, 2017

Alexander Fisch
Supervising Planner
Planning Services Division
Community Development Resource Agency
3091 Country Center Drive
Auburn, CA 95603

Re: Draft EIR for Alpine Sierra Subdivision (SCH# 2014042028)

Dear Placer County,

Since 1986 I have owned a home in Alpine Meadows. In the early 2000's I became aware of the risks of wildfires to Alpine Meadows through a report completed by consultants for the Alpine Springs Water District and I was the founder of the Alpine Meadows Fire Safe Committee. Our committee included representatives of the 3 homeowners associations in Alpine Meadows and sought to facilitate practices in the Valley to reduce the risk and severity of a wildfire. I am also a past president and current Board member of one of the Homeowner associations and an alternate to the architectural review committee.

Through a variety of experts the Fire Safe Committee learned that one of the most significant risks to those in Alpine Meadows was a fire in the lower portion of the valley which is heavily forested that would move uphill (this is common for fires) into the forested areas and wreck havoc through the residential areas up to and including the ski area and the area of the proposed Alpine Sierra development. Such a fire could move very quickly. In the event the tall trees on both sides of the lower portion of Alpine Meadows road were to catch fire and Alpine Meadows road to become impassable the only road in and out of Alpine Meadows would become, at least temporarily, unusable for fire personnel as well as residents seeking to evacuate.

F26-1

Over the years efforts have been made to reduce the fuel load, (with some limited success), educate the homeowners about fire risks and the need for defensible space, (with reasonable success) and prompt a change in policy in the architectural review committee in terms of tree removal (which has been successful).

My other residence is in Sonoma County, where I have recently witnessed the wholesale devastation of thousand of homes through the recent wildfire and I know many who lost their homes and barely escaped with their lives. To survive people literally ran for their lives without gathering any possessions as the fire. In a news report KXTU (a local TV station) stated:

"Experts say initially, the fire spread at 200 feet per second – six football fields a minute. "

As we all know dozens of lives were lost, some of which occurred due to burned trees falling on the road and blocking the evacuation route. The stories are horrific and true (a picture of a presumably non combustible building attached). Our home served as a safe place for evacuees, as we were fortunate to be sufficiently west of the fire to be safe from the fire's path. It should be pointed out that in spite of the relatively large presence of fire fighting resources in urban areas the fire burned out of control for the first few days, fire fighting efforts were focused on evacuations and trying to save the local hospitals (which were barely successful).

Living through this horrific fire in Sonoma County and the human tragedies that abound made me look carefully at the fire implications in Alpine Meadows of the draft EIR.

In reviewing the DEIR I found such major omissions in the area of fire safety the only appropriate action by Placer County would be to reject the DIER due to inadequate fire safety provisions.

I offer the following comments as someone with long history in the Valley and a level of expertise in the area of fire risk in Alpine Meadows. Every expert I have spoken with has said the same thing. "Its not a question of if Alpine Meadows has a major fire event, it's a question of when."

F26-1 Cont.

FIRE SAFETY:

The Draft EIR states, "The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency." The Draft EIR proposes a mitigation primarily consisting of : 1) using fire resistant building materials and 2) shelter-in-place HOA facilities 3) purchasing an additional fire truck and (4) doing defensible space work.

Fire Resistant Building Materials and Shelter in Place

- As was evidenced in the recent fire in Sonoma County there is no such thing as a fireproof building (see photo attached). In the event of a large forest fire, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life, but will make it somewhat easier to find victims.

F26-2

The idea of sheltering in place is only feasible in a fire of very short duration that does not penetrate the structure people are hoping will protect them from a fire. It is an inadequate substitute for evacuation, which is the only way to protect the lives of those caught in a significant wildfire. As discussed below the fire fighting resources in Alpine Meadows (personnel) are grossly inadequate and the only assured level of staffing in the Alpine Meadows Fire Station is 2 firefighters for 150 days a year. F26-2 Cont.

Purchase of a second fire truck and inadequate numbers of fire fighting staff in Alpine Meadows

- The purchase of a second fire truck will have limited benefit without the addition of fire fighters who can use the truck. What was not included in the draft EIR was the fact that fire protection is provided by North Tahoe Fire Department through a contract (see attached). The contract requires that North Tahoe staff the Alpine Meadows fire station with 2 staff for **150 days a year,** any increase above the 150 days in a year is dependent on grant funding being available. Currently North Tahoe does have grant funding from FEMA which has resulted in them being able to have staff at the fire station for an average of 28.2 days a month in 2017, which means that in any given month there are 2 days when no one is at the fire station. If the FEMA grant is lost or reduced (which is always possible) then the staffed days at the fire station could be reduced to as little as 150 a year. The draft EIR does not address the necessity of any funding for fire fighters who are necessary to operate the second truck. Nor does the DEIR address the fact that fire fighters are not present in the Alpine Meadows Fire Station 365 days a year, and that the days per year in the future could be as few as 150 days/year.

- As a result the proposed mitigation of an additional fire truck is of little to no value. If there is no one in Alpine Meadows in an emergency to operate the second truck, it will be of little benefit in protecting lives and property.

F26-3

- The cumulative effect of recently approved development comes into play. If fire fighting personnel has to defend more homes than are in Alpine Meadows today this will further strain the very limited fire fighting resources available and will make a very dangerous situation even more so. This will be particularly true for those at the end of the Valley in the proposed Alpine Sierra development that is on a dead end road. Anyone present in the Alpine Sierra development will create additional people hoping to get out of the Valley before the fire gets to him or her. If a fallen tree blocks access to the dead end road, or the main road, there will likely be an increase the number of fatalities.

F26-4

- There are many lots in Alpine Meadows that are approved for development and additional homes could, and likely at some point will, be built on. The DIER fails

F26-5

to incorporate the impact of these already approved lots on traffic, evacuation and fire safety issues. F26-5 Cont.

Inadequate Evacuation Plan

- Absent a second evacuation route anyone in Alpine Meadows is at significant risk in the event of a wildfire. There is no better option than evacuation when there is a fire.

- Assuming that Alpine Meadows road remains passable for evacuees (which is a very a big if) highway 89 will likely be at a standstill, thereby precluding people from evacuating Alpine Meadows and cars will be backed up along Alpine Meadows road. This will likely occur if there are similar evacuations from Squaw Valley (which is highly probable). The traffic impact of today will be made worse in the future by the recently approved development of hundreds of new dwellings in Squaw Valley. Often "normal" weekend traffic is so impacted that cars are being backed up on Alpine Meadows road due to highway 89 being gridlocked. Weekend and holiday driving times of one hour to Tahoe City or one and a half hours to Truckee are common today. F26-6

- Absent a second evacuation route, the likely outcome will be significant loss of life. With Alpine Sierra being at the end of the road, and in a wooded area the odds of a safe evacuation is the lowest.

- **Recommended Mitigations' for Fire Safety**

  - Require the developer of Alpine Sierra to fund on an ongoing basis (24x7x365) the 2 fire fighters needed to operate the truck they have proposed to purchase. F26-7

  - Require the developer to create a second evacuation route. There are equipment roads within the ski area that lead from the Alpine Meadows ski area to Ward Canyon. The Forest Service owns much, if not all, of the land and should be amenable to providing an easement for an evacuation route. Such an evacuation exit would greatly reduce the risk of loss of life in a major fire event as well as provide emergency vehicles a second route into Alpine Meadows. While snow covers these roads in the winter, the wildfire risk in the winter is virtually nonexistent. When the snow melts, and the road becomes passable, is when there is a major risk of dangerous wildfires. F26-8

  - As precedent for the above please refer to the Homewood Evacuation Plan, that is the result of a legal settlement. My understanding is that the California Clean Energy Committee (CCEC) sued the owners of the Homewood Mountain Resort (HMR/JMA) when the expansion was approved in Dec. 2011. It's my

understanding that, the CCEC prevailed on the issue of fire safety and evacuation. This resulted in a settlement whereby HMR/JMA had to agree to implement an Evacuation Plan developed by the North Tahoe FPD that would result in "non-exacerbation" of the fire risk for Homewood. The plan includes a new central station at the new HMR resort, additional truck(s), personnel, equipment, etc. The NTFPD developed the Homewood Evacuation Plan, and HMR/JMA is responsible for ensuring it is implemented. There are some items that might be funded by agreements with the county/etc., but essentially HMR/JMA have to agree to provide all the additional funding needed to implement the Evacuation Plan if they want to construct their resort. F26-8 Cont.

- Adding further development to this high-risk area will significantly increase the risk that evacuation will not be successful in the event of a large forest fire, which in turn dramatically increases the risk for existing residents. F26-9

Traffic:

The Draft EIR analysis relies primarily on one-day traffic surveys to develop the modeling. For winter traffic, the date was Sunday March 11, 2012 on which the analysis said the peak morning traffic was 10:45-11:45am. Using data from one day from 5 years ago for an extremely low snowfall year, is invalid. To be able to "cherry pick" the date for traffic study is flawed. I could show that there is virtually no traffic on the bay bridge if allowed to pick the date. The traffic study should be done during peak demand, holiday weekends in the winter and summer. In 2017 I spent 90 minutes getting from the Alpine Meadows ski area in a shuttle to the base of Squaw Valley, it would not have been any faster if I was in a car. F26-10

In addition, the Draft EIR fails to address the proposed White Wolf project directly across Alpine Meadows road as well as the build out of existing lots in Alpine Meadows. The DIER needs to address the cumulative traffic impact of all approved and proposed new residences, both in Alpine Meadows and Squaw Valley. F26-11

Conclusion

The DIER as written provides grossly inadequate fire protection and does not address the fact that staff is needed in Alpine Meadows to use the fire truck. Furthermore, a second entrance/exit road needs to be completed before this project is safe. F26-12

Thank you for your careful consideration of my comments.

John Moise
1466 Beaver Dam Trail
Alpine Meadows, CA 96146

Shirlee Herrington

Subject: FW: Burned steel building, please include as an attachment to my comments on the Alpine Sierra development proposal

From: John Moise [mailto:jmoise@yahoo.com]
Sent: Friday, November 03, 2017 2:13 PM
To: Alexander Fisch
Subject: Fwd: Burned steel building, please include as an attachment to my comments on the Alpine Sierra development proposal

Begin forwarded message:

From: John Moise <jmoise@yahoo.com>
Subject: Burned steel building
Date: November 3, 2017 at 1:24:24 PM PDT
To: jmoise@yahoo.com

F26-13

9/10/06

AGREEMENT FOR FIRE PROTECTION, EMERGENCY MEDICAL AND RELATED SERVICES BY THE NORTH TAHOE FIRE PROTECTION DISTRICT TO THE ALPINE SPRINGS COUNTY WATER DISTRICT

THIS AGREEMENT FOR FIRE PROTECTION, EMERGENCY MEDICAL AND RELATED SERVICES ("Agreement") is entered into as of September 11, 2006, by and between **NORTH TAHOE FIRE PROTECTION DISTRICT ("North Tahoe")** and **ALPINE SPRINGS COUNTY WATER DISTRICT ("Alpine Springs")**, (individually, "Party"; collectively, "Parties").

RECITALS

A. **North Tahoe** is a California special district duly authorized to provide all services permitted to be performed by a fire protection district pursuant to the California Fire Protection District Act, Health and Safety Code §§ 13800 et seq. **North Tahoe** provides such services in the **North Tahoe** areas of Placer County, from the El Dorado County line to the Nevada State line ("North Tahoe Service Area").

B. **Alpine Springs** is a California special district duly authorized to provide all services permitted to be performed by a fire protection district pursuant to the California Fire Protection District Act, Health and Safety Code §§ 13800 et seq., pursuant to the authority granted it in Water Code § 31120. **Alpine Springs** provides such services in the Alpine Meadows subdivision of Placer County ("Alpine Springs Service Area").

C. **North Tahoe** currently provides certain fire protection and emergency medical services in the **Alpine Springs** area of responsibility pursuant to an agreement with **Alpine Springs**.

D. The Parties have agreed that **North Tahoe** shall provide fire protection, emergency medical and related services as described in this Agreement to **Alpine Springs** and in the **Alpine Springs** service area, on a long-term basis subject to the following terms and conditions.

AGREEMENT

1. Scope of Services.

a. **North Tahoe** shall provide to **Alpine Springs**, for the term of this Agreement, all fire protection, fire prevention, fire suppression, rescue and emergency medical services; hazardous materials services and response; enforcement of the fire codes and other fire protection ordinances, fire origin and arson investigation, plan checks and inspections; training and related administrative services, including grant application and grant administration; and fire district support services, including, but not limited to, supervision and management, dispatching, training, and equipment procurement and maintenance services; procurement and maintenance of adequate stocks

of supplies and materials; advertising, providing and supporting the Chipper Program, to the extent of available grant funding; advertising, providing and supporting the Defensible Space Program; public information and fire safety education; emergency preparedness planning and other necessary services; all on the same basis and to the same extent as provided in the **North Tahoe** service area.

b. Each Party shall adopt its own fire codes, but shall consult with the other Party prior to any amendment or adoption of fire codes different from those in effect on the date this Agreement commenced. Each Party shall make all reasonable effort, subject to the authority of the respective Boards of Directors, to coordinate fire code provisions.

c. Without altering the independent contractor status described by Section 5, **Alpine Springs** shall designate the **North Tahoe** Fire Chief ("Fire Chief") to carry out the functions and duties of fire chief/marshal within **Alpine Springs** for purposes of fire service management and enforcement of **Alpine Springs** ordinances. The Fire Chief shall be vested with full power and authority regarding the allocation of fire, emergency medical and related resources within the **North Tahoe** Service Area and the **Alpine Springs** Service Area; the method and manner of delivery of services; the assignment, evaluation and discipline of personnel; and other matters related to the control of personnel, assignment of equipment or other resources employed by or under the control of **North Tahoe** and other operational decisions respecting delivery of services in either District.

d. The Fire Chief, or designee, shall provide a monthly written report to the **Alpine Springs** Board of Directors and shall attend a Board of Directors meeting to report and answer questions at least once per quarter. Additional reporting and information to the Board shall be as mutually agreed between the **Alpine Springs** General Manager and the Fire Chief. Each year, within thirty (30) days following adoption of the annual budget by **North Tahoe**, the Fire Chief will report the annual operating plan, including the anticipated staffing schedule of the Alpine Meadows Fire Station, to the **Alpine Springs** Board of Directors.

e. **Alpine Springs** shall retain the responsibility for providing a water system and water service within the **Alpine Springs** service area, including the installation and maintenance of fire hydrants. **North Tahoe** and **Alpine Springs** shall cooperate to inspect all fire hydrants to ensure that the hydrants within **Alpine Springs** are mechanically operable. Upon learning of any fire hydrant problem, whether learned by inspection or otherwise, **North Tahoe** shall promptly notify **Alpine Springs** of the problem and **Alpine Springs** shall promptly make repairs or corrections as needed, at its own expense. **Alpine Springs** shall provide snow removal services for hydrants and to maintain access to the Alpine Meadows Fire Station.

f. **North Tahoe** may separately negotiate terms of supplemental fire, emergency medical or related service funding with Placer County and/or the Alpine Meadows Ski Resort for the purpose of providing additional services pursuant to Sections 4.b and 4.c.

g. For all grants for which matching funds are required, **North Tahoe** shall be responsible for the matching funds.

2. Term of Agreement.

This Agreement shall commence January 1, 2007, and continue in effect until terminated as provided by this Section. Except as provided by Sections 6.b and 7, this Agreement shall not terminate prior to December 31, 2021. Beginning December 31, 2018, either Party may terminate this Agreement upon written notice of not less than thirty–six (36) months.

3. Facilities and Equipment.

a. Upon the effective date of this Agreement, **Alpine Springs** shall:

(i) Lease to **North Tahoe** the present Alpine Meadows Fire Station and attached fixtures (collectively, "Fire Station") for one dollar per year for the duration of this Agreement; and

(ii) Transfer to **North Tahoe** possession and title to the existing fire apparatus, tools and equipment and all Fire Station furnishings and equipment.

b. **North Tahoe** shall:

(i) Provide all exterior and interior maintenance and repair of the Fire Station, including the roof, walls and foundations, and the plumbing, electrical, HVAC and other systems, such that the building at all times is fully functional as a fire station and crew quarters for fire fighters;

(ii) Maintain the Fire Station in as good or better a condition as when received, ordinary wear and tear excepted; and

(iii) Keep a record of all improvements and repairs to the Fire Station, exceeding $1,000 in value and having a useful life of more than three (3) years, made by **North Tahoe** during the duration of this Agreement and keep a record of the annual depreciated value of such improvements and repairs based on the fixed asset depreciation schedules for public entities set forth in Governmental Accounting Standards Board Statement No. 34 (GASB 34).

c. The Parties acknowledge that, prior to approval of this Agreement, representatives of both Parties completed a formal "walk-through" inspection of the Fire Station to determine if any deficiencies exist. **Alpine Springs** and **North Tahoe** agree that the only deficiencies found that require correction by **Alpine Springs** are replacing the linoleum in the upstairs kitchen, removing the stove pipe from the living room and patching the roof/ceiling. **Alpine Springs** agrees to correct these deficiencies at **Alpine Springs**'s expense within sixty (60) days of the effective date of this Agreement.

d. Upon termination of this Agreement, **North Tahoe** shall:

(i) Return possession of the Fire Station to **Alpine Springs** and **Alpine Springs** shall pay **North Tahoe** the original cost of the repairs and improvements made by **North Tahoe** to the Fire Station, less accrued depreciation on such repairs and improvements; and

(ii) Transfer to **Alpine Springs** its right, title and interest to and possession of the fire apparatus, tools and equipment and all Fire Station furnishings and equipment that is (1) described in Section 3.a(ii) and/or such substitutes or replacements thereof as may have from time to time been acquired by **North Tahoe** or (2) acquired with fire mitigation fee funds pursuant to Section 4.a(iv). Such returned property shall be in like kind and condition as when received by **North Tahoe**, ordinary wear and tear excepted. Alternatively, **North Tahoe** may elect to pay to **Alpine Springs** a sum equal to the then fair market value of any such property not returned to **Alpine Springs**, with such sum fully taking into account the age and condition of the equipment on the date this Agreement commenced and normal wear and tear.

(iii) In the event any of the items described in Sections 3.a(ii) or 4.a(iv) are determined by **North Tahoe** to be obsolescent or otherwise beyond its useful life for purposes of providing services under this Agreement, **North Tahoe** shall offer to transfer such property at that time to **Alpine Springs** at no cost or to dispose of it, as may be elected by **Alpine Springs**.

4. <u>Implementation Schedule</u>.

a. Prior to June 30, 2007, **North Tahoe** shall:

(i) Commence alteration and remodeling, at its own expense, of the Fire Station to accommodate two on-duty firefighters. Alterations to the exterior of the Fire Station shall be subject to **Alpine Springs** prior written consent, which shall not unreasonably be withheld. Interior modifications, repairs and improvements shall be at the sole discretion of **North Tahoe**. **North Tahoe** shall be responsible for obtaining all necessary permits and for the cost thereof;

(ii) Place a Type 1 fire engine and paramedic ambulance into service at the Fire Station, equipped to meet or exceed NFPA and Sierra Sacramento Valley EMS standards, as applicable, provided all apparatus shall be scheduled and assigned at the sole discretion of the Fire Chief, based on operational needs, maintenance and repair or system status management patterns throughout the service area of **North Tahoe** and **Alpine Springs**;

(iii) Provide standardized mobile and handheld radios at the Fire Station;

(iv) Complete, at its own expense, a Capital Facilities Plan ("Plan") on behalf of **Alpine Springs** for review and approval by the **Alpine Springs** Board of Directors. If approved, **Alpine Springs** shall use its best efforts to implement the Plan through the adoption of a Fire Mitigation Fee and, upon adoption, shall

submit the Plan to Placer County. **North Tahoe** shall, at its own expense, review and update, as needed, the Plan annually. All mitigation fees and any similar fees from developer agreements shall be invested and expended in accordance with the provisions of the Plan, provided that, upon adoption of the Plan, the **Alpine Springs** Board of Directors shall authorize the Fire Chief to implement the Plan, including adopting specifications for apparatus or equipment purchase, procuring apparatus or equipment consistent with **North Tahoe** procurement policy, entering into contracts with vendors and making payment. **North Tahoe** shall be reimbursed for such payments by **Alpine Springs** from available fire mitigation fee funds within thirty (30) days of presenting evidence of such payment to **Alpine Springs** or as soon thereafter as fire mitigation fee funds are available to **Alpine Springs**. **Alpine Springs** shall transfer to **North Tahoe** title and possession of any apparatus or equipment purchased by **North Tahoe** through the implementation of the Plan. Upon termination of this Agreement, the disposition of such apparatus and equipment shall be determined pursuant to Section 3.d(ii).

b. Between July 1, 2007 and June 30, 2008, **North Tahoe** will assign a two-person engine company to operate out of the Fire Station at least 120 days, 24 hours each day, during the year, subject to Section 1.c, with the specific days to be determined by the Fire Chief. Additional days of staffing may be provided if a grant is awarded to provide additional staffing at the Fire Station; additional funding is obtained from Placer County or the Alpine Meadows Ski Resort for fire, emergency medical or related services; or other funding permits.

c. Between July 1, 2008 and thereafter throughout the term of this Agreement, **North Tahoe** will assign a two-person engine company to operate out of Fire Station at least 150 days, 24 hours each day, during the year, subject to Section 1.c, with the specific days to be determined by the Fire Chief. Additional days of staffing will be provided if a grant is awarded to provide additional staffing at the Fire Station; additional funding is obtained from Placer County or the Alpine Meadows Ski Resort for fire, emergency medical or related services; or other funding permits.

5. <u>North Tahoe Employees</u>.

All employees, including, but not limited to, the Fire Chief, agents, contractors or subcontractors hired or retained by **North Tahoe** are employees, agents, contractors or subcontractors of **North Tahoe** and not of **Alpine Springs**. Nothing in this Agreement shall be construed to be inconsistent with this relationship or status. **Alpine Springs** shall not be obligated in any way to pay any wage claims or other claims made against **North Tahoe** resulting from performance of this Agreement by any such employees, agents, contractors or subcontractors, or any other person.

6. <u>Financial Provisions</u>.

a. **Alpine Springs** shall pay **North Tahoe** for the performance of the services described in this Agreement on the following schedule:

Payment Due Date	Amount
Within 45 days of receipt by **Alpine Springs** of the first property tax revenue for fiscal year ("FY") 2006-07 from Placer County, but not sooner than January 2, 2007	$40,000
Within 45 days of receipt by **Alpine Springs** of the second property tax payment for FY 2006-07 from Placer County	$50,000
Within 45 days of receipt by **Alpine Springs** of the third property tax payment for FY 2006-07 from Placer County	$10,000
Within 45 days of receipt by **Alpine Springs** of the first property tax revenue from Placer County for FY 2007-08	$128,000
Within 45 days of receipt by **Alpine Springs** of the second property tax payment for FY 2007-08 from Placer County	$160,000
Within 45 days of receipt by **Alpine Springs** of the third property tax payment for FY 2007-08 from Placer County	$32,000
Within 45 days of receipt by **Alpine Springs** of the first property tax payment for FY 2008-09 from Placer County	$144,000
Within 45 days of receipt by **Alpine Springs** of the second property tax payment for FY 2008-09 from Placer County	$180,000
Within 45 days of receipt by **Alpine Springs** of the third property tax payment FY 2008-09 from Placer County	$36,000
Beginning FY 2009-10,and each fiscal year thereafter, within 45 days of receipt by **Alpine Springs** of the first property tax payment from Placer County	80% of gross property tax received by **Alpine Springs**
Beginning FY 2009-10 and each fiscal year thereafter, within 45 days of receipt by **Alpine Springs** of the second property tax payment from Placer County	80% of gross property tax received by **Alpine Springs**
Beginning FY 2009-10 and each fiscal year thereafter, within 45 days of receipt by **Alpine Springs** of the third property tax payment and any additional property tax payment for that fiscal year	80% of gross property tax received by **Alpine Springs**

"Gross property tax" for these purposes shall mean all property taxes on the Placer County secured and unsecured rolls, including but not limited to real, personal, supplemental or unitary property taxes, county fire tax, possessory interest tax and

homeowner's property tax redemption funds, however denominated, based on property located within or otherwise inuring to **Alpine Springs**, including delinquent collections thereof. "Gross property tax" does not include collection of delinquent water, sewer or garbage service accounts and related water, sewer or garbage service charges placed on the property tax rolls.

b. If property tax revenue received by **Alpine Springs** is estimated by the County to be less than 95% of the property tax revenue received by **Alpine Springs** in the prior fiscal year, the Parties agree to meet not later than October 31 of that fiscal year to renegotiate the level of service to be provided under this Agreement. If no agreement is reached by the Parties within ninety (90) days, the Parties agree that **North Tahoe** may reduce the level of service to **Alpine Springs** to match the revenue available from **Alpine Springs** and, at its option, provide not less than twelve (12) months notice of termination of this Agreement. If services are reduced, notwithstanding the termination provisions of this Agreement, **Alpine Springs** may provide notification of termination of this Agreement to be effective not less than twelve (12) months from the date of such notification.

7. Dispute Resolution.

In the event that a dispute arises with regard to this Agreement, the Parties agree to work in good faith to resolve the dispute. If informal means of resolution are unsuccessful, either Party may send a written dispute notice to the other Party demanding performance within fifteen (15) days ("Performance Period").

a. Mediation. The Parties agree to mediate any dispute or claim arising between them out of this Agreement or any resulting transaction before resorting to arbitration or court action. If the dispute is not resolved during the Performance Period, within sixty (60) days after the end of Performance Period, either Party may demand in writing that the dispute be promptly submitted to a mediator for resolution. Mediation fees, if any, shall be divided equally among the Parties involved. If any Party commences an arbitration or court action based on a dispute or claim to which this Section applies without first attempting to resolve the matter through mediation, then that Party shall not be entitled to recover attorneys' fees, even if they would otherwise be available to that Party in any such arbitration or court action.

b. Arbitration. Any controversy or claim arising out of or related to this Contract, or the breach thereof, and not resolved by mediation shall be settled through binding arbitration in accordance with the Rules of the American Arbitration Association or of the Judicial Arbitration and Mediation Service (JAMS), as may be selected by the Party filing for arbitration, except that discovery pursuant to California Code of Civil Procedure § 1283.05 shall be allowed. The foregoing notwithstanding, the Parties may mutually agree to the following arbitration procedure: they shall select the arbitrator, who shall be a retired judge or justice, or an attorney with not less than five (5) years substantial experience with public entity law, and in such case the arbitration shall be conducted in accordance with Part III, Title 9 of the California Code of Civil Procedure,

except that discovery pursuant to California Code of Civil Procedure § 1283.05 shall be allowed.

The Parties agree to be bound by an arbitrator's order for specific performance. Failure to perform in accordance with such order is grounds for injunction or termination of this Agreement at the prevailing party's option.

Judgment upon the award rendered by any arbitrator(s) shall be in accord with substantive California law and may be entered in any court having jurisdiction thereof. Claims within the monetary limits of the Small Claims Court shall be litigated in such court at the request of either Party, so long as both Parties limit their right to recovery to the jurisdiction of the Small Claims Court. Any claim filed in Small Claims Court shall be deemed to be a waiver of the right to arbitrate, and if a counter claim in excess of the jurisdiction of the Small Claims Court is filed in Superior Court then the Party filing in Small Claims Court may demand arbitration pursuant to this subsection. Any arbitration under this Agreement shall be deemed commercial arbitration, not subject to the consumer arbitration provisions of California Code of Civil Procedure § 1284.3.

c. Attorneys' Fees. In the event of legal proceedings, including any arbitration, for the enforcement or interpretation of this Agreement, the prevailing party in such proceeding shall be entitled to its reasonable attorneys' fees and costs. If a Party prevails on some issues and an opposing Party on other issues, the arbitrator or judge, as the case may be, shall apportion attorneys' fees and costs as is just and equitable in the circumstances.

d. Exclusions from Mediation and Arbitration. The following matters are excluded from mediation and arbitration hereunder:

(i) A judicial or non-judicial foreclosure or other action or proceeding to enforce a deed of trust, mortgage or installment land sale contract as defined in California Civil Code § 2985;

(ii) The filing or enforcement of a mechanic's lien;

(iii) Any matter which is within the jurisdiction of a probate or small claims court; and

(iv) An action for bodily injury or wrongful death, or for latent or patent defects to which California Code of Civil Procedure § 337.1 or § 337.15 applies.

8. Indemnification.

a. North Tahoe shall defend, indemnify and hold **Alpine Springs**, its elected officials, officers, employees, volunteers and agents free and harmless from any and all claims, demands, causes of action, costs, expenses, liability, loss, damage or injury, in law or equity, to property or persons, including wrongful death, in any manner arising out of or incident to any alleged acts, omissions, negligence or willful misconduct of **North**

Tahoe, its elected officials, officers, employees, agents, subcontractors, subconsultants and volunteers arising out of or in connection with **North Tahoe**'s performance of, or obligations under, this Agreement, including without limitation the payment of all consequential damages and attorneys' fees and other related costs and expenses, except such loss or damage which was caused by the active negligence, sole negligence or willful misconduct of **Alpine Springs**.

North Tahoe shall defend, at **North Tahoe**'s own cost, expense and risk, any and all such aforesaid suits, actions or other legal proceedings of every kind that may be brought or instituted against **Alpine Springs**, its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers arising out of or in connection with **North Tahoe**'s performance of, or obligations under, this Agreement. **North Tahoe** shall pay and satisfy any judgment, award or decree that may be rendered against **Alpine Springs** or its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers, in any such suit, action or other legal proceeding. **North Tahoe** shall reimburse **Alpine Springs** and its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers, for any and all legal expenses and costs incurred by each of them in connection therewith or in enforcing the indemnity herein provided.

North Tahoe's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by **Alpine Springs**, its elected officials, officers, employees, agents or volunteers.

b. **Alpine Springs** shall defend, indemnify and hold **North Tahoe**, its elected officials, officers, employees, volunteers and agents free and harmless from any and all claims, demands, causes of action, costs, expenses, liability, loss, damage or injury, in law or equity, to property or persons, including wrongful death, in any manner arising out of or incident to any alleged acts, omissions, negligence or willful misconduct of **Alpine Springs**, its elected officials, officers, employees, agents, subcontractors, subconsultants and volunteers arising out of or in connection with **Alpine Springs**'s performance of, or obligations under, this Agreement, including without limitation the payment of all consequential damages and attorneys' fees and other related costs and expenses, except such loss or damage which was caused by the active negligence, sole negligence or willful misconduct of **North Tahoe**.

Alpine Springs shall defend, at **Alpine Springs**'s own cost, expense and risk, any and all such aforesaid suits, actions or other legal proceedings of every kind that may be brought or instituted against **North Tahoe**, its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers arising out of or in connection with **Alpine Springs**'s performance of, or obligations under, this Agreement. **Alpine Springs** shall pay and satisfy any judgment, award or decree that may be rendered against **North Tahoe** or its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers in any such suit, action or other legal proceeding. **Alpine Springs** shall reimburse **North Tahoe** and its elected officials, officers, employees, agents, subcontractors, subconsultants or volunteers, for any and all

legal expenses and costs incurred by each of them in connection therewith or in enforcing the indemnity herein provided.

Alpine Springs's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by **North Tahoe**, its elected officials, officers, employees, agents or volunteers.

9. Insurance.

a. Time for Compliance. **North Tahoe** shall not commence Services under this Agreement until it has provided evidence satisfactory to **Alpine Springs** that it has secured all insurance required under this section. In addition, **North Tahoe** shall not allow any subcontractor to commence work on any subcontract until it has provided evidence satisfactory to **Alpine Springs** that the subcontractor has secured all insurance required under this section.

b. Types of Required Coverages. As a condition precedent to the effectiveness of this Agreement for work to be performed hereunder and without limiting the indemnity provisions of the Agreement, **North Tahoe** in partial performance of its obligations under such Agreement, shall procure and maintain in full force and effect during the term of the Agreement, the following policies of insurance:

(i) Commercial General Liability: Commercial General Liability Insurance which affords coverage at least as broad as Insurance Services Office "occurrence" form CG 0001, with minimum limits of at least $5,000,000 per occurrence. Defense costs shall be paid in addition to the limits.

The policy shall contain no endorsements or provisions limiting coverage for (1) products and completed operations; (2) contractual liability; (3) third party action over claims; or (4) cross liability exclusion for claims or suits by one insured against another.

Without limiting the generality of the above, the policy shall insure against all bodily injury, property damage, personal injury and other loss or liability caused by or connected with **North Tahoe**'s occupation and use of the Fire Station under this Agreement.

(ii) Medical Malpractice Liability Insurance: Medical Malpractice Liability Insurance for all activities of **North Tahoe** and its employees arising out of or in connection with this Agreement in an amount of no less than five million dollars ($5,000,000) in the aggregate annually. In the event **North Tahoe** cannot provide an occurrence policy, **North Tahoe** shall provide insurance covering claims made as a result of performance of Agreement and shall maintain such insurance in effect for at least six (6) months following termination or expiration of this Agreement.

(iii) Automobile Liability: Automobile Liability Insurance with coverage at least as broad as Insurance Services Office Form CA 0001 covering "Any Auto" (Symbol 1) with minimum limits of $5,000,000 each accident.

(iv) Workers' Compensation: Workers' Compensation Insurance, as required by the State of California and Employer's Liability Insurance with a limit of not less than $1,000,000 per accident for bodily injury and disease.

c. Endorsements.

The policy or policies of insurance required by Sections 9.b(i) Commercial General Liability, 9.b(ii) Medical Malpractice Liability Insurance and 9.b(iii) Automobile Liability shall be endorsed to provide the following:

(i) Additional Insured: The indemnified parties shall be additional insureds with regard to liability and defense of suits or claims arising out of the performance of the Agreement. Additional Insured Endorsements shall not (1) be restricted to "ongoing operations"; (2) exclude "contractual liability"; (3) restrict coverage to "sole" liability of **North Tahoe**; or (4) contain any other exclusions contrary to the Agreement.

(ii) Primary Insurance and Non-Contributing Insurance: This insurance shall be primary and any other insurance, deductible, or self-insurance maintained by the indemnified parties shall not contribute with this primary insurance.

(iii) Severability: In the event of one insured, whether named or additional, incurs liability to any other of the insureds, whether named or additional, the policy shall cover the insured against whom claim is or may be made in the same manner as if separate policies had been issued to each insured, except that the limits of insurance shall not be increased thereby.

(iv) Cancellation: The policy shall not be canceled or the coverage suspended, voided, reduced or allowed to expire until a thirty (30) day prior written notice of cancellation has been served upon **Alpine Springs** except ten (10) days prior written notice shall be allowed for non-payment of premium.

(v) Duties: Any failure by the named insured to comply with reporting provisions of the policy or breaches or violations of warranties shall not affect coverage provided to the indemnified parties.

(vi) Applicability: That the coverage provided therein shall apply to the obligations assumed by **North Tahoe** under the indemnity provisions of the Agreement, unless the policy or policies contain a blanket form of contractual liability coverage.

The policy or policies of insurance required by Section 9.b(iv) Workers' Compensation shall be endorsed, as follows:

(i) Waiver of Subrogation: A waiver of subrogation stating that the insurer waives all rights of subrogation against the indemnified parties.

(ii) Cancellation: The policy shall not be canceled or the coverage suspended, voided, reduced or allowed to expire until a thirty (30) day prior written notice of cancellation has been served upon **Alpine Springs** except ten (10) days prior written notice shall be allowed for non-payment of premium.

d. Deductible. Any deductible or self-insured retention must be approved in writing by **Alpine Springs** and shall protect the indemnified parties in the same manner and to the same extent as they would have been protected had the policy or policies not contained a deductible or self-insured retention.

e. Evidence of Insurance. **North Tahoe**, concurrently with the execution of the Agreement, and as a condition precedent to the effectiveness thereof, shall deliver either certified copies of the required policies, or original certificates and endorsements on forms approved by **Alpine Springs**. The certificates and endorsements for each insurance policy shall be signed by a person authorized by that insurer to bind coverage on its behalf. At least fifteen (15) days prior to the expiration of any such policy, evidence of insurance showing that such insurance coverage has been renewed or extended shall be filed with **Alpine Springs**. If such coverage is cancelled or reduced, **North Tahoe** shall, within ten (10) days after receipt of written notice of such cancellation or reduction of coverage, file with **Alpine Springs** evidence of insurance showing that the required insurance has been reinstated or has been provided through another insurance company or companies.

f. Failure to Maintain Coverage. **North Tahoe** agrees to suspend and cease all operations hereunder during such period of time if the required insurance coverage is not in effect and evidence of insurance has not been furnished to **Alpine Springs**. **Alpine Springs** shall have the right to withhold any payment due **North Tahoe** until **North Tahoe** has fully complied with the insurance provisions of this Agreement.

g. Acceptability of Insurers. Each such policy shall be from a company or companies with a current A.M. Best's rating of no less than A:VII and authorized to do business in the State of California, or otherwise allowed to place insurance through surplus line brokers under applicable provisions of the California Insurance Code or any federal law.

10. Miscellaneous.

a. Entire Agreement. This Agreement and its attachments constitute the entire agreement between **North Tahoe** and **Alpine Springs** respecting the matters set forth herein. **Alpine Springs** and **North Tahoe** each represent that neither has relied on any promise, inducement, representation or other statements made in connection with Agreement that is not expressly contained herein.

b. Negotiated Agreement. The Parties agree that this Agreement shall not be construed in favor of, or against, any Party by reason of the extent to which any Party or

its counsel participated in the drafting of this Agreement. The Parties represent that they have consulted legal counsel prior to the execution of this Agreement and have executed this Agreement with full knowledge of its meaning and effect.

c. Assignment. Neither **Alpine Springs** nor **North Tahoe** shall have the right to assign its respective rights and obligations hereunder without the written consent of the other Party. This Agreement shall be binding upon and inure to the benefit of the Parties hereto and their respective heirs, personal representatives, and successors and assigns.

d. Amendment. This Agreement may be amended, modified or supplemented only in writing signed by both **Alpine Springs** and **North Tahoe**.

e. Waiver. The failure of any Party hereto at anytime or times to require performance of any provision hereof shall in no manner affect its right at a later time to enforce the same. No waiver by a Party of any condition or a breach of any term contained in this Agreement shall be effective unless in writing and no waiver in any one or more instances shall be deemed to be a further or continuing waiver of any such condition or breach in any other instance or wavier of any other condition or breach of any other term.

f. Governing Law. This Agreement shall be interpreted in accordance with the laws of the State of California. If any action is brought to interpret or enforce any term of this Agreement, the action shall be brought in a state or federal court situated in the County of Placer, State of California. In the event of any such litigation between the Parties, the prevailing party shall be entitled to recover all reasonable costs incurred, including reasonable attorneys' fees, as determined by the court.

g. Construction. The language and all parts of Agreement shall be construed, in all cases, according to its fair meaning. The Parties acknowledge that each Party has reviewed and revised Agreement in that the normal rule of construction to the effect that any ambiguities are to be resolved against the drafting Party shall not be employed in the interpretation of Agreement. Titles and headings are for reference purposes only and shall not be used to interpret this Agreement.

h. Survivability. Section 8, Indemnification, shall survive the termination of this Agreement.

i. Notices. Notice to the Parties in connection with this Agreement shall be given personally or by certified mail, return receipt requested, addressed as follows:

TO **ALPINE SPRINGS**: **Alpine Springs** County Water District
270 Alpine Meadows Road
Alpine Meadows, CA 96146
ATTN: General Manager

TO **NORTH TAHOE**: **North Tahoe** Fire Protection District
P.O. Box 5879
Tahoe City, CA 96145

ATTN: Fire Chief

Notice shall be effective at the time of personal delivery or seventy-two (72) hours after mailing by certified mail, return receipt requested.

j. No Third Party Beneficiaries. There are no intended third party beneficiaries of any right or obligation assumed by the Parties.

k. Authority to Enter Agreement. Each Party warrants that the individuals who have signed this Agreement have the legal power, right and authority to make this Agreement and bind each respective Party.

l. Invalidity; Severability. If any portion of this Agreement is declared invalid, illegal or otherwise unenforceable by a court of competent jurisdiction, the remaining provisions shall continue in full force and effect.

m. Counterparts. This Agreement may be signed in counterparts, each of which shall constitute an original.

AGREED to the year and day first above written at Tahoe City, Placer County, California.

ALPINE SPRINGS COUNTY WATER DISTRICT	**NORTH TAHOE FIRE PROTECTION DISTRICT**
By: Barbara Danz, President	By: Duane Whitelaw, Fire Chief
[*Type name, title*]	[*Type name, title*]
Date: September 11, 2006	Date: September 20, 2006

Response to Comment Letter F26

John Moise
November 3, 2017

F26-1 The comment provides introductory remarks and introduces the Alpine Meadows Fire Safe Committee, which has outlined the fire risks in the area and the effort reduce the fuel load, educate home owners, and prompt policy changes. The comment summarizes the Sonoma County fires and their effects. The comment states that the Draft EIR is inadequate in its fire safety analysis and evacuation and Placer County should reject the proposal.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F26-2 The comment summarizes the Draft EIR discussion of fire safety, states that the fire-resistant building materials and a shelter in place facility will not prevent the loss of life in a large forest fire, and states that these measures are not a substitute for evacuation.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place. The Emergency Preparedness and Evacuation Plan (updated version provided as Final EIR Appendix J3) recognizes that most residents would prefer to evacuate. However, the NTFPD has indicates that there are instances where shelter in place is necessary (e.g., fire threat is not imminent at one location but is at another and roadways need to remain free-flowing to ensure orderly evacuation). The proposal to provide Shelter-in-Place facilities allows people within the project site a viable option to protect themselves during a wildfire and allows NTFPD to most effectively manage the local and regional response to a fire.

F26-3 The comment states that the use of an additional fire truck is limited without more fire staff, that the Alpine Meadows fire station is only manned 28.2 days per month and is funded through a 150 day/year North Tahoe Fire Protection District contract and a FEMA grant (which isn't guaranteed). The comment states that the Draft EIR does not address fire fighter funding or that the Alpine Meadows Fire Station is not staffed year round.

Please refer to Master Response 5, Emergency Response and Evacuation. Both the Alpine Springs County Water District and the North Tahoe Fire Protection District,

which is the contract fire services provider, were consulted during preparation of the Draft EIR to verify the District's need for and available capacity to use a new fire engine.

F26-4 The comment states that the cumulative effect of the recently approved homes will strain the limited firefighting resources and personnel and will result a dangerous situation, which could be exacerbated by fallen trees blocking the roads.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F26-5 The comment states that the Draft EIR does not include the Alpine Meadows lots that have been approved but not developed in its traffic, evacuation and fire safety analysis.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F26-6 The comment states that emergency evacuation is inadequate: the plan is missing a second evacuation route, and traffic could make Alpine Meadows and State Route 89 impassable, especially with development in Squaw Valley. The comment states that loss of life is likely without a second evacuation route, especially in a wooded area.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 10, Shelter-in-Place.

F26-7 The comment recommends that the developer fund two firefighters to operate the fire truck 24 hours/day, 7 days/week, and 365 days/year.

Please refer to Master Response 5, Emergency Response and Evacuation.

F26-8 The comment recommends requiring the developer to create a second evacuation route, perhaps through the equipment roads within the ski area. The comment refers to the Homewood Evacuation Plan, which was the result of litigation and was developed by the North Tahoe Fire Protection District for implementation by the project applicant.

The infeasibility of access alternatives is discussed in Draft EIR Chapter 7, Transportation and Circulation. In addition, Draft EIR page 13-18 states "while neither Alternative A or Alternative B would have a secondary egress, Placer County and the applicant have coordinated extensively with the serving fire agency to develop mitigation measures that are incorporated into both project alternatives to provide a high level of emergency preparedness." This issue is also addressed under Master

Response 5, Emergency Response and Evacuation, as it pertains to applicant efforts to negotiate a second point of project access with the Bear Creek Association and the U.S. Forest Service.

F26-9 The comment states that adding more development in a high risk area will increase the risk of evacuation failure.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F26-10 The comment states that the traffic analysis relies on cherry-picked data from old, one-day traffic surveys during a low snow year and that the traffic study should be redone during peak demand, holiday weekends in the winter and summer.

Please refer to Master Response 4, Traffic**.**

F26-11 The comment states that the Draft EIR fails to include the White Wolf project and the build out of existing lots in Alpine Meadows, especially in the cumulative traffic impact.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F26-12 The comment provides conclusory remarks and states that the Draft EIR provides grossly inadequate fire protection, does not address that staff is needed to use the fire truck, and a second entrance/exit road is needed.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F26-13 The comment provides a photo of a burned steel building, which is referenced in comment F26-2 with the statement that there is no such thing as a fireproof building.

Please refer to Master Response 10, Shelter-in-Place, regarding the potential for fire-hardened buildings to burn in a wildfire. The comment does not provide any evidence that the building in the photograph incorporated the fire-resistant measures required by the proposed Emergency Preparedness and Evacuation Plan, such as defensible space clearing, fire sprinklers or screened vents, which are some of the elements incorporated into this project. Notably, the vegetation visible in the photograph does not show signs

of having been managed to reduce fuel loads. Thus it is not reasonable to reach conclusions regarding the proposed project's fire safety based on this photograph.

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I/we have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75-hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F27-1

The analysis also assumes that a majority of the houses will be “recreational homes,” which have “relatively low” traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Y in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F27-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F27-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8-foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F27-4

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F27-5

Warmly,

Andrew Branagh
1473 Upper Bench, Alpine Meadows

&

63 La Cuesta Rd, Orinda. CA 94563
530-304-3724

Response to Comment Letter F27

Andrew Branagh
Undated

F27-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Impacts.

F27-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Impacts.

F27-3 The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F27-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F27-5 The comment identifies concern with Mitigation Measure 7.3a, which requires snow removal at the project site entrance.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. My wife and I own a home in Alpine Meadows on John Scott Trail adjacent to the proposed development. We respectfully ask that you please consider the following concerns that we have on the current DEIR.

Traffic and Safety

The DEIR traffic assessment is not realistic given that this new development will access a highly traveled alpine road prone to avalanches and traffic delays due to heavy snow and ice. The traffic analysis on the DEIR was performed during 2012, a year with very low snow during ideal conditions. Traffic on Hwy 89 has increased dramatically in the last two years. Furthermore, the DEIR does not consider the maximum capacity of the project during weekends and holidays or account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals.

From personal experience, there have been many days when it has been nearly impossible or unsafe to exit from Bear Creek Drive onto Alpine Meadows road due to bumper-to-bumper traffic. Once on the road, a weekend drive time from Alpine Meadows to Tahoe City was well over an hour at peak traffic conditions. In addition to the current traffic, the final EIR should also consider the cumulative effect that will occur with the proposed White Wolf subdivision and Village at Squaw Valley. F28-1

Beyond the increase in traffic volume, the single point of entrance is proposed to be within 160 feet of the White Wolf Development entrance which will include 155 additional parking places among other development. The confluence of these roads with the Alpine Meadows ski area parking lot and the Chalet Road must be considered as a safety issue especially with persistent snow and ice in the area. For example, large snow events will turn Alpine Meadows road into a narrow 2-lane corridor with 6-8 foot snow banks from Hwy 89 to the Alpine Meadows Lodge. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year.

Finally, is it safe for this project to only have one entrance/exit point? Given the recent events in Napa and Sonoma, it is clear that a safe and reliable ingress/egress during an emergency must be a top priority when considering this type of development.

Visual and Noise Impacts

The visual simulation of Alternative A (Figure 5.4) as viewed from the Five Lakes Trail is not an accurate rendering of the development. The DEIR rendering depicts houses as brownish F28-2

smudges overlaid on an image of the existing forest. In fact, at first glance, I thought that the rendering was a depiction of the current state rather than the proposal. An accurate depiction should include the additional exposed earth from the cuts into the hillside, the roadways, loss of trees and vegetation, additional cars, and house structures. F28-2 Cont.

Closer to home, this analysis does not adequately address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail. Visual simulations from the most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level. The visual impacts should include the effects of tree removal for defensible space throughout the development. F28-3

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to safeguard that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F28-4

Avalanche, Snow and Drainage

I am concerned that the DEIR does not adequately address the effect snow removal from the proposed roadways on John Scott Trail. The main access road to the development crosses a known avalanche zone and makes no consideration of how the road, tree removal, or the snow clearing will affect the stability of the snow in that area. Furthermore, climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F28-5

Finally, I am concerned that there has not been an adequate assessment of the effect of the development on erosion and run-off into Bear Creek. Has the County assessed whether there is adequate area on suitable slopes on each home site for the construction of effective permanent erosion control measures? Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100-year flood plains along the Truckee River? F28-6

I hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Michael Nashner
2034 John Scott Trail
Alpine Meadows, CA 96146

Response to Comment Letter F28

Michael Nashner
Undated

F28-1 The comment identifies several concerns with the validity of the traffic impact analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated. The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot. The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12, Cumulative Scenario. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety and response to comment F4-17.

F28-2 The comment states that the visual simulation (figure 5-4) is not realistic and that a realistic simulation would include exposed earth from the hillside cuts, the roadways, loss of trees and vegetation, the additional cars, and houses.

Please refer to Master Response 2 regarding the methodology used to prepare the visual simulation.

F28-3 The comment states that the Draft EIR does not adequately address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail and suggests visual simulations from the most impacted vantage points be prepared to assess the impacts, and to determine if mitigation measures are realistic.

Please refer to Master Response 2, Visual Resources.

F28-4 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period. The comment states that all construction noise in the Alpine Meadows Valley is loud and echoes through the valley. The comment inquires as to how mitigation measures will be enforced to ensure that noise levels are not significant, and states that it is not reasonable for construction activities to be exempt from noise thresholds when those activities may occur over multiple years. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided. The comment states that road and bridge construction activities will require very large equipment and requests that noise from these construction activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F28-5 The comment expresses concern that the Draft EIR does not adequately address the effect of snow removal on John Scott Trail as the road crosses a known avalanche zone. The comment states there is no consideration of the how the road, tree removal, or snow clearing will affect the stability of the snow in the area. The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs. These factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The comment states the Draft EIR does not use current science to discuss or analyze how the project will influence future conditions onsite, above and below the project site, the ingress/egress on Alpine Meadow Road.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazards and the changes in avalanche hazards due to climate change.

F28-6 The comment expresses concern that the Draft EIR did not adequately address the erosion and run off into Bear Creek. The comment questions if the County has evaluated whether there is adequate space for the construction of effective permanent erosion control measures at each home-site. The commenter questions how the defensible space clearly will affect snowpack melting and consequential increase in storm water runoff and 100-year flood plains along the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

Comment Letter F29

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I/we have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F29-1

The analysis also assumes that a majority of the houses will be "recreational homes," which have "relatively low" traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F29-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F29-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F29-4

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F29-5

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F29-6

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F29-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F29-8

Biological resources

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F29-9

Defensible Space

How is it possible to due defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F29-10

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F29-11

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F29-12

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of of potential impacts and mitigation measures? Do they recommend more study? F29-13

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F29-14

We hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

George Sauter and Susan Biddle
1919 Cub Lane
Alpine Meadows, CA 96146

Response to Comment Letter F29

George Sauter and Susan Biddle
Undated

F29-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F29-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F29-3 The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F29-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 89 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F29-5 The comment identifies concern with Mitigation Measure 7.3a, which requires snow removal at the project site entrance.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8, Snow Storage, and Master Response 11, Avalanche Hazards, and response to comment F3-17.

F29-6 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter-in-Place facilities.

F29-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that these factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements. The comment states that the Draft EIR does not provide any analysis of how these changes would affect the project, including access to the project site. As this comment is provided below the heading "avalanche," it is understood that the comment identifies a concern that future avalanche hazards could differ from what is evaluated in the Draft EIR.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F29-8 The comment identifies concern that the snow removal and storage on the slope below Road A could cause avalanches onto John Scott Trail because proposed Road A cuts across an avalanche path. The comment notes that John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadow Road is closed due to avalanches.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazards.

F29-9 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F29-10 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F29-11 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires as to how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F29-12 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F29-13 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water

Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F29-14 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7 regarding the potential changes in drainage due to vegetation removal.

Alpine Sierra Environmental Impact Report Comments by Ernest.

I have read all chapters. There is a lot repetition.

There will be a lot of grading during road construction as well as during construction of houses and driveways. It is not clear where all the surplus material from grading will be placed. It is not clear where the snow storage will be. It should be made a condition that no snow will be blown or deposited on Bear Creek association land. Snow storage at the entrance to this development should be in such a way so that drivers can see up and down Alpine Meadows road. Will there be a turning lane for this development on Alpine Meadows Road. Who will enforce the speed limit? F30-1 F30-2 F30-3

Under 4.1The annual snow fall is given as 350 400 inches, This is I believe is incorrect. F30-4

4.1.1 They are listing 500 permanent residents. This should be checked. F30-5

MM-4:There is a reference to employee houses, but do not think where and how many was explained. There is a comment about landscaping but it ignores the Cal fire regulations which are mentioned in later chapters, there is no mention about the MWELO REGULATION WHICH CREATES CONFLICTS. F30-6 F30-7

4.3. There are comments about noise levels. I expect that there will be a lot of blasting which is high noise level which may continue for several years ,because it is doubtful that the sub division will be completed in just two or three years. There are comments here as well as in other chapters about an architectural handbook that will outline the rules for getting a building permit. We need a copy of this booklet. There needs to be some discussion about the booklet. There are some discrepancies. F30-8

Who will do the review of plans when there is no committee appointed. If the developer will do the plan review this would be a conflict of interests. F30-8 Cont.

There is a reference to erosion control. How will water from the roof of houses and driveways or sitting areas.be handled. Will downspouts be connected to drain pipes? F30-9

6.1 What is a vegetation management plan, who prepares it and who approves it. F30-10

7. The number of cars are based on previous years when we did have poor snow condition and the traffic was uneven and low. F30-11

7.3 Study snow removal and snow storage at entrance road,

7.4 re read this section

7.5 Provides for two vehicles at the subdivisions entrance. Will there be a bridge at entrance and will this bridge have bike. lane? F30-12

MM 7.4c;

Who is responsible for the conditions. F30-13

8.1-2.1There is a reference to noise level at 9 September which is after labor day. Please clarify. F30-14

13,1. Hazards and fire safety Explain what is applicable. Is there an exit plan in case of a wild fire or avalanche. Can we get a copy of the Wild Fire protection plan.? There I a comment about irrigation .Does this a F30-15

apply to the 5’ restriction for no planting along the building? There is a comment about removing tree branches that overhand the roof, Who will control this requirement? F30-15 Cont.

13.8c2: Does the planning book require fire resistant building material? F30-16

13.16 This not very clear. How does this apply with California regulation called MWelo. F30-17

13,17 Save Aspens Should Aspens be planted in dry arears or are they expected to be irrigated? F30-18

15.1 accumulative impact. There is a reference to an increase of 101 homes in the next 20 years. Where does number come from? F30-19

16, Chapter CE QA Are there that many empty lots???? F30-20

16.7.33 Look at C-1 and C-2 and alternate D,THERE NEEDS TO BE MORE DISCUSSIUON ON EACH SOLUTION. F30-21

Chapter17 References Architecture handbook was prepared by DALE Cox local Architect.(Chapter 5 Alpine Sierra planned community.) F30-22

Response to Comment Letter F30

Ernest Wertheim
Undated

F30-1 The comment states that it is unclear where the surplus grading material will be placed.

As states on Page 11-12 of Chapter 12: Geology, excess material from grading cuts would be transported offsite because it was determined that the soil type present would be unsuitable for fill. All appropriate permits would be obtained for the offsite location for the excess material. Truck traffic required to transport excess grading material offsite was included in the air quality modeling completed for the project (Draft EIR Appendix G).

F30-2 The comment states that it is unclear where the snow storage will be and requests a condition that prohibits snow to be blown onto Bear Creek Association land. Additionally, the comment states that snow storage at the entrance should allow drivers to see all of Alpine Meadows Road. The comment also questions if a turning lane will be developed for the proposed project.

Please refer to Master Response 8, Snow Storage. Draft EIR page 7-17 states that roadside tapers would be provided at the intersection of proposed Road A and Alpine Meadows Road and that these would be sufficient to allow vehicles to enter and exit Road A without encroaching on other lanes. A left turn lane along Alpine Meadows Road is not warranted for the proposed project. Refer also to response to comment F4-17.

F30-3 The comment questions who will enforce the speed limit.

Like all public roadways, law enforcement will continue to enforce the speed limit. The commenter does not identify any inaccuracies or inadequacies in the Draft EIR.

F30-4 The comment states that the 350 to 400 inches of annual snowfall under 4-1 is incorrect.

Please refer to the discussion of annual snowfall in Master Response 8, Snow Storage.

F30-5 The comment states that the estimate of 500 residents should be checked.

The estimated permanent resident population is based on the Municipal Services Review for Area 3 Services prepared by the Placer County Local Agency Formation Commission in 2004. In addition, the U.S. Census Bureau estimated that the total population within the 94146 zip code, which includes Olympic Valley in addition to the Alpine Meadows valley, was 968 people in 2016 (Census 2018).

F30-6 The comment states that the location or amount of employee housing is not identified.

See Master Response 14, Project Merits, as it pertains to affordable housing. Mitigation Measure 4.1a states that, prior to recordation of each Final Map, the project shall prepare and receive approval of an employee housing plan in compliance with Placer County General Plan Policy C-2 which may consist of a combination of onsite housing, offsite housing, dedication of land needs, or in-lieu payments. A portion of the project's affordable housing component would be provided onsite and the remainder would be fulfilled as described in the master response.

F30-7 The comment states that Mitigation Measure 4 mentions landscaping but ignores CALFIRE regulations and doesn't mention the water-efficient landscaping requirements.

The California Model Water Efficient Landscaping Ordinance (MWELO) which was updated per executive order on April 1, 2015 and required local agencies to adopt the MWELO standards or pass their own ordinances by December 1, 2015. It is not clear which mitigation measure this comment addresses. The only mitigation measure that includes the word "landscape" or "landscaping" is Mitigation Measure 11.2c, which discusses requirements related to the project's Improvement Plans. There is nothing in this measure that would conflict with the MWELO requirements. Moreover, in October 2017 Placer County adopted the MWELO as ordinance # 5887-B. These requirements would be applicable to each individual lot within the proposed project because they would involve new construction projects that include a new landscape equal to or greater than 500 square feet, require landscaping as part of the project, and require either a permit, plan check, or design review.

F30-8 The comment asserts that there will be a high level of blasting, which would create high noise levels lasting for several years and states that it is doubtful that the subdivision will be completed in just two or three years. The comment requests a copy of the architectural handbook that will outline rules for getting a building permit and for further discussion within the Draft EIR about the architectural handbook. The comment asserts that there are discrepancies within the Draft EIR. The comment inquires about who will review plans without an appointed committee. The comment

expresses concern that if the developer conducts the plan review, this would be a conflict of interest.

Please refer to Master Response 6, Noise, regarding noise impacts associated with blasting. The Architectural Handbook was provided in Draft EIR Appendix B. Section 3-1 of the Architecture Handbook defines how the Design Committee would be established. Conditions of approval pertaining to approval of final home designs and compliance with development standards will also be incorporated into the project conditions of approval.

F30-9 The comment questions how water from the roof of houses and driveways or sitting areas will be handled and if downspouts will be connected to drainpipes.

Please refer to the discussion of Low Impact Design measures and Best Management Practices in Master Response 7, Hydrology and Water Quality.

F30-10 The comment asks who will prepare and approve the vegetation management plan.

An updated version of the proposed Alpine Sierra Forest Management and Fuel Reduction Plan is provided in Final EIR Appendix J-2. This plan was prepared by a Registered Professional Forester with experience in the Sierra Nevada.

F30-11 The comment states that the traffic data is based on previous years and during a low snow year when traffic was uneven and low.

Please refer to Master Response 4, Traffic.

F30-12 The comment requests additional study of snow removal and snow storage at the project entrance road. The comment also states that section 7.5 provides for two cars at the entrance and asks if there will be a bridge at the entrance and if it will have a bike lane.

Please refer to Master Response 8 regarding snow storage. The proposed Tentative Subdivision Map provided in Appendix B shows that a bridge would be used to cross Bear Creek. No separated bicycle lanes are proposed for Road A.

F30-13 The comment questions who is responsible for the conditions in Mitigation Measure 7.4c.

The project applicant and construction contractor would be required to create and implement the Construction Traffic Management Plan, subject to approval by Placer

County. The Construction Traffic Management Plan must meet the performance standards identified in this measure.

F30-14 The comment states that in Section 8.1-2.1 of the Draft EIR, there is a reference to noise level on September 9th, which is after Labor Day, and requests clarification.

It is unclear to what specifically the commenter intends or requests. Summer noise monitoring occurred between September 6th and September 9th, 2013. Please refer to Master Response 6, Noise.

F30-15 The comment requests an explanation of what is applicable in hazards and fire safety and questions if there is an exit plan for wildfire or avalanche. The comment requests a copy of the Wild Fire protection plan and notes a comment about irrigation. Finally, the comment questions who will require the removal of overhanging branches.

Please refer to Master Responses 5, 9, 10, and 11 for discussions regarding fire and avalanche safety and evacuation. An updated version of the proposed Alpine Sierra Forest Management and Fuel Reduction Plan is provided in Final EIR Appendix J2. Implementation of the required vegetation management measures would be the responsibility of the project developer for areas adjacent to roads and common areas, and would be the responsibility of individual lot owners as each home is constructed.

F30-16 The commenter asks if the Planning Book requires fire resistant building material.

Please refer Master Response 9, Fuel Management and Fire Safety regarding requirements to use fire resistant building material.

F30-17 The commenter states that 13.16 is not very clear and asks how it applies in the context of the MWELO.

The commenter does not identify what is unclear. There is no Section 13.16, Impact 13.16, or Mitigation Measure 13.16 in the Draft EIR. Refer to response to comment 30-7.

F30-18 The commenter asks if aspens will be planted in drier areas or if they will be irrigated.

The project does not propose to plant aspens. The proposed Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2) notes that previously robust stands of quaking aspen have been reduced in size by the encroachment of shade tolerant conifer trees and includes

recommendations to preserve some aspen trees as part of the vegetation thinning and removal required under this plan.

F30-19 The comment questions where the 101 increase in homes in the cumulative impact analysis comes from.

The estimate prepared by Placer County Planning Division staff that there will be 101 new homes constructed in the Alpine Meadows valley over the next 20 years is based on the historic average growth rate in this area of approximately 0.6 percent per year.

F30-20 The comment references Chapter 16, CEQA Considerations, and asks if there are that many empty lots.

The comment is unclear. Chapter 16 does not discuss cumulative development projections or any amount of empty lots in the project area. In the context of comment F30-19 this comment can be understood to refer to the growth projection used to describe the cumulative scenario. The projection reflects consideration by the Planning Department of the approved but not yet constructed Alpine Knolls project, as well as the development potential in the valley.

F30-21 The comment states that there needs to be more discussion of alternatives C1, C2, and D.

The alternatives analysis complies with CEQA Guidelines Section 15126.6, which states: "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed…. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison". The comment does not state in which way the alternatives discussion is insufficient. Please refer to Master Response 13 for additional discussion of the project alternatives.

F30-22 The comment states "Architecture handbook was prepared by DALE Cox local Architect. (Chapter 5 Alpine Sierra planned community.)"

The intent of this comment is unclear. The Architecture Handbook is provided in Draft EIR Appendix B3.

Comment Letter F31

Alpine Sierra Subdivision Development
Draft EIR Dated Sept 2017
Comments Due to Placer County November 3, 2017 by 5:00 p.m.

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. We have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F31-1

The analysis also assumes that a majority of the houses will be “recreational homes,” which have “relatively low” traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people with multiple vehicles into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F31-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F31-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F31-4

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In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F31-5

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"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F31-6

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, like the wildfires in recent years, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life. Having only one access road to the site makes it very difficult and dangerous to escape a rapidly approaching wildfire, not to mention the added traffic on 89 which makes fire egress even more difficult.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadows Road. F31-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F31-8

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality.
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

F31-9

This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level. F31-10

Biological resources

<u>Special-status Species</u>

The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described. F31-11

The biologic report reaches a faulty conclusion that other special-status wildlife species such as the Sierra Marten, Sierra Nevada Showshoe Hare and long-legged Myotis are unlikely to be using the site for denning/nesting due to human presence or development within 1,000 feet uphill and downhill from the site. However, there is **not** development within 1,000 feet of the entire perimeter of this site, so further studies need to be done to 1,000 feet of the entire perimeter. F31-12

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F31-13

Defensible Space

How is it possible to conduct defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F31-14

Noise

The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years.

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood. F31-15

Geology

When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F31-16

Hydrology

Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F31-17

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F31-18

We hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region. F31-18 Cont.

Sincerely,

Annie Yates
John Dawes
Owners of 1990 John Scott Trail, Alpine Meadows

Response to Comment Letter F31

Annie Yates and John Dawes
Undated

F31-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, and the lack of consideration of the potential for recreation homes to be occupied by large groups of people. The comment also states that the EIR fails to account for the cumulative impacts of the Village at Squaw Valley and White Wolf projects and recommends that the project's impact at the State Route 89/State Route 28 intersection be evaluated.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario.

F31-2 The comment states that the EIR must consider the cumulative impact of development in the region on emergency response times and evacuation efforts in the case of a wildfire.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F31-3 The comment states that the EIR must consider the effects of the White Wolf project proposed on the opposite side of Alpine Meadows Road, particularly with respect to the proposal to construct 155 parking spaces on the White Wolf site and the associated effects to roadway safety during periods of ice and snow and given the proximity of the proposed White Wolf site access to the proposed Alpine Sierra site access point and the existing Ginzton/Chalet Road and entrance to the ski area parking lot.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

F31-4 The comment identifies concern that the emergency access evaluation does not reflect the level of traffic congestion experienced on State Route 80 and Alpine Meadows Road during the past ski season and requests additional information regarding the ability of emergency responders to access the existing and proposed development in Alpine Meadows valley when the road width is limited due to heavy snow accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F31-5 The comment identifies concern with Mitigation Measure 7.3a, which requires snow removal at the project site entrance.

The comment does not specify the nature of the concern regarding this mitigation measure. Please refer to Master Response 8, Snow Storage, and Master Response 11, Avalanche Hazards.

F31-6 The comment notes that the project has single point of access and proposes shelter-in-place as mitigation for the project's impacts associated with potential exposure of site residents to hazards from fire, avalanche, or other emergencies. The comment inquires if the County has performed a study to confirm this is realistic and achievable and whether the shelter-in-place provisions would be effective in the case of a slower moving/longer burning fire.

Please refer to the discussion of building materials and project design in Master Response 9, Fuel Management and Fire Safety, and to Master Response 10 regarding the Shelter-in-Place facilities.

F31-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that these factors affect steep slopes, large cut/fill volumes, road clearing and snow storage requirements. The comment states that the Draft EIR does not provide any analysis of how these changes would affect the project, including access to the project site. As this comment is provided below the heading "avalanche," it is understood that the comment identifies a concern that future avalanche hazards could differ from what is evaluated in the Draft EIR.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F31-8 The comment identifies concern that the snow removal and storage on the slope below Road A could cause avalanches onto John Scott Trail because proposed Road A cuts across an avalanche path. The comment notes that John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadow Road is closed due to avalanches.

Please refer to Master Response 8 regarding snow storage and Master Response 11 regarding avalanche hazards.

F31-9 The comment states that the visual simulation of the proposed project provided in the Draft EIR is inaccurate because it does not reflect the amount of grading required for project construction, does not use accurate colors for paved surfaces and buildings, does not indicate any glare or reflection from windows and vehicles, and does not reflect the degree of vegetation removal that would occur.

Please refer to Master Response 2 in regards to the methodology used for preparation of the visual simulation.

F31-10 The comment states that the Draft EIR does not evaluate visual impacts to existing homes in the adjacent subdivision and that visual simulations from the most impacted vantage points should be prepared.

Please refer to the discussion in Master Response 2 regarding the potential for the project to adversely impact views from the adjacent subdivision.

F31-11 The comment questions how Mitigation Measure 6.5a can be feasibly implemented given that yellow warbler was observed onsite and the presence of a yellow warbler nest could restrict the construction season. The comment states that this and other mitigation requirements would lengthen the project construction to more than 20 years, which would cause additional impacts in the areas of noise, air quality, wildlife, and visual resources.

Refer to Master Response 3, Biological Resources regarding the effect of Mitigation Measure 6.5a on construction activities and response F3-9 regarding the potential effects of a lengthened construction period.

F31-12 The comment references the biological resources assessment (Appendix D of the Draft EIR) conclusion that other special-status species are unlikely to found onsite because there is development within 1,000 feet uphill and downhill of the site. The comment states that this conclusion is erroneous because there is not development within 1,000 feet of the entire perimeter of the site.

Please refer to Master Response 3, Biological Resources.

F31-13 The comment identifies concern about run-off into Bear Creek, the length of the construction period, and the potential impact on fish in Bear Creek and the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

F31-14 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F31-15 The comment states that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period, fails to recognize that noise in the project area echoes through the valley, and does not address noise impacts at neighboring communities. The comment inquires as to how mitigation measures will be enforced, and states that construction activities that last for many years should not be exempt from the County's noise thresholds. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided, that noise from use of very large equipment that may be needed for road and bridge construction be modeled, and that the noise analysis address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F31-16 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F31-17 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F31-18 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality.

Comment Letter F32

Alpine Sierra Subdivision Development
Draft EIR Dated Sept 2017
Comments Due to Placer County November 3, 2017 by 5:00 p.m.

Sample Comments below – choose what items concern you most

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

Re: Comments on the Draft Environmental Impact Report for the Alpine Sierra Development

Dear Mr. Fisch:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the Alpine Sierra Development. I/we have the following concerns with the DEIR:

Traffic Analyses

Traffic Survey

The traffic analysis relies on one-day traffic surveys from 2012, a year in which we received less than 50 percent of average snow fall; this is not acceptable. The DEIR then models a Level of Service (LOS) for 2014; however, this modeling fails to correspond with reality. Traffic on Hwy 89 has increased dramatically in the last two years. The County assertions of LOS A and B for the intersection of Alpine Meadow Road and Hwy 89 do not reflect 2-hour drive times from Truckee to Alpine Meadows Lodge, or the 1.75 hour drive times from Alpine Meadows Lodge to Tahoe City (actual conditions in 2017). To suggest the development would add just 1-second additional time for a vehicle getting through the Alpine Meadows and Hwy 89 signal is contrary to actual experiences both this last winter and this last summer. F32-1

The analysis also assumes that a majority of the houses will be "recreational homes," which have "relatively low" traffic generation. This fails to address the maximum capacity of the project during weekends and holidays. It also does not account for the popularity of vacation rentals and the tendency to pack large groups of people into such rentals, which are well understood. The final EIR should take this into account.

Cumulative Impacts

The DEIR also fails to account for the cumulative impacts of the Village of Squaw Valley and White Wolf Development projects. They will significantly increase travel time around the region, particularly north and south bound Hwy 89 from Truckee to Tahoe City. For this reason, the impact on the intersection of Hwy 89 and SR 28, the Wye in Tahoe City, should also be considered. This will increase emergency response time as well as evacuation efforts in the case of a wildfire. The County must take into consideration the cumulative impact of development in the region in the final EIR. F32-2

The DEIR does not address the proposed project directly across Alpine Meadows Road from this site, the White Wolf Development. That project plans to develop 155 parking places with all of its traffic accessing Alpine Meadows Road within 160' of ingress/egress for Alpine Sierra. With snow and ice on the road, this is a significant safety and LOS issue that is compounded by the entrance to the ski area parking lot and Ginzton/Chalet Road all within 600' which already experiences (periodic) LOS F conditions. F32-3

Emergency Response

The emergency access evaluations ignore the reality of LOS F conditions last winter not only on Hwy 89 but also along Alpine Meadows Road. During large snow events the Alpine Meadows Road from the intersection with Hwy 89 to the ski area lodge is a narrow 2-lane corridor with 6-8 foot snow banks. How will fire trucks and ambulances navigate these conditions when there is no available room for an emergency vehicle? An additional fire truck as an appropriate mitigation measure falls short during these emergency response conditions, especially when the current fire station in Alpine Meadows is not staffed 24/7, 365-days a year. F32-4

Snow Removal

In a big snow year, we are concerned about the mitigation measure MM7.3a, to remove snow from the corner of the intersection the project entrance and Alpine Meadows Road. F32-5

Hazards

"The County Zoning Ordinance requires at least two vehicle entry/exit points unless otherwise determined by the County Planning Commission. At present, only one access road to the project site is contemplated. Because a second access to the project site is not feasible, other components of the project will be enhanced to ensure that residents and guests would be safe if they remained within the project site during a fire, avalanche or other emergency."

The Draft EIR proposes a 2-part mitigation: 1) using fire resistant building materials and 2) shelter-in-place HOA facilities. F32-6

Fire

Has the County performed a study to see if this is realistic or achievable? Does it make sense for the shelter-in-place facility to be located next to diesel storage tanks? In the event of a large forest fire, that burns for longer than an hour, the fire-resistant building materials and a shelter in place facility will not prevent the loss of life.

Avalanche

Climate models now predict very different snow fall patterns, rain-on-snow patterns, and earlier and quicker seasonal melt-offs, all of which will affect the steep slopes, large cut/fill volumes, road clearing and snow storage requirements, etc. The DEIR provides no discussion or analyses using current science and how the changes will influence future conditions above the site, onsite, below the site, or the site ingress/egress on Alpine Meadow Road. F32-7

There is particular concern about the impact of snow removal on the slope below the long section of Road A. The road cuts across an avalanche path and should snow be blown onto the slope below (to the north), it could cause different snow loading resulting in avalanches onto John Scott Trail below. This is particularly worrisome as John Scott Trail provides emergency access from the ski area to the lower part of the valley when Alpine Meadows Road is closed due to avalanche(s). F32-8

Visual impacts

During the NOP, the public identified the visual impact on the development from the Five Lakes Trail as an area of concern. The analysis is weak. For example Figure 5.4, Visual Simulation of Alternative A, is inaccurate in the following ways:

- The simulation does not depict cuts in the earth for roadways and home construction, and the bright color of cut rock and exposed earth that will occur, as recognized in the foreground of the picture.
- Roadways themselves are much darker and less reflective than they would be in reality.
- The colors of the buildings are all monochromatic, in a color which only slightly varies from the surrounding trees. This is not how the development will actually be built.
- All the windows are shown as dark without any areas of reflection. The proposal for the limited use of non-reflective glass will still result in areas of glass that will be highly reflective.
- There are no cars or other bright and shiny objects in the view.
- Tree removal for defensible space throughout the project is not depicted in a way that accurately shows the changes to the landscape.

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This analysis also does not address the visual impact from houses along Bear Creek Drive, Big John Road, and John Scott Trail in the adjacent subdivision. Visual simulations from most impacted vantage points should be prepared, to assess the real visual significance of the project, and to determine if it is realistic to mitigate the visual impacts to an insignificant level.

F32-10

Biological resources

<u>Special-status Species</u>

The report states the following: "Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a significant impact. MM 6.5a and MM 6.5b would reduce this impact to less than significant level by requiring pre-construction nest surveys, practices for minimizing disturbance of identified nests, and preparation of a Vegetation Management Plan to identify tree protection measures to be implemented during construction."

The special-status Yellow Warbler was observed at the site. If nests are found within 100 of the feet of the site, this will significantly reduce construction season to starting after August 15. How realistic is it enforce mitigation measure MM6.5a, when construction season is so short, and the potential to extend the construction time period for years beyond the expected schedule? How realistic is it to enforce mitigation measure MM6.5a, when the construction schedule may be pushed back to the point that excavation and slope stabilization is not complete prior to the fall rainy season? These restrictions further lengthen what will be a 15-20 year project, which then causes many other significant impacts in terms of noise, air quality, disturbance to other wildlife, and visual impact, which have not been adequately addressed in the DEIR. The construction period is not a temporary period as described.

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F32-12

Fish

We are concerned about the run-off into Bear Creek, associated with the likely inability to construct the project within the short construction season, and the impact on fish in Bear Creek and the Truckee River. F32-13

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How is it possible to due defensible space tree removal and meet the requirements of the County's Tree Preservation ordinance? F32-14

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The noise analyses fail to evaluate the potential for construction noise over a 20-year build-out period. All construction noise in the narrow Alpine Meadows Valley is loud and echoes throughout the valley. How will mitigation measures be enforced to insure that noise is not significant? It does not seem reasonable for the County to exempt construction activity from noise that is considered significant when that construction activity may last for multiple years. F32-15

Fundamental to CEQA is the disclosure of all potential impacts of the development on the neighboring communities, and this report fails to address the neighboring subdivisions. Estimates for noise levels at different building levels (estimated units per year under construction) should be provided. Road and bridge construction activities will require very large equipment and these volumes should be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

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When evaluating whether or not the project will result in significant disruptions, displacements, compaction, or overcrowding of the soil, how is the County determining that the proposed mitigation measures are adequate? Does Lahontan Regional Water Quality Board agree with the County assessment of potential impacts and mitigation measures? Do they recommend more study? F32-16

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Has the County assessed whether there is adequate area on suitable slopes on each homesite for the construction of effective permanent erosion control measures? If not, has the need for project level treatment of stormwater generated by individual homesites been evaluated? Does Lahontan Regional Water Quality Board agree with the County assessment of of potential impacts and mitigation measures? Do they recommend more study? F32-17

Has an evaluation been made of tree clearing for defensible space and its impact on earlier melting of snowpack and consequential increase in storm water runoff and how this may impact 100 year flood plains along the Truckee River? F32-18

I/we hope these comments will aid Placer County in creating a Final EIR that adequately addresses the proposed development's impact on the Alpine Meadows valley and the Tahoe-Truckee region.

Sincerely,

Griffeth Tully Digitally signed by Griffeth Tully Date: 2018.01.14 15:15:31 -08'00'

Response to Comment Letter F32

Griffith Tully
No Date

F32-1 The comment identifies several concerns with the validity of the traffic impacts analysis, including the age of the existing traffic volume data, collection of that data during a low snow year, that the documented intersection levels of service do not reflect the long travel times experienced in the region, the assumptions regarding the number of recreation homes, the lack of consideration of the potential for recreation homes to be occupied by large groups of people, and the lack of consideration of the Village at Squaw Valley Specific Plan and White Wolf projects in the cumulative analysis.

Please refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis.

F32-2 The comment states that the analysis of emergency response and evacuation should consider the effects of cumulative development in the region.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 12, Cumulative Scenario.

F32-3 The comment states that the Draft EIR does not address the White Wolf project proposed project which would access Alpine Meadows Road within 160 feet of the ingress/egress for Alpine Sierra and the associated roadway level of service and safety during snow and icy conditions.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study and Master Response 12 regarding the validity of the cumulative impacts analysis. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Refer also to response to comment F4-17.

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accumulation. The comment states that providing an additional fire truck as mitigation is inadequate given the roadway constraints and lack of year-round staffing at the Alpine Meadows fire station.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety.

F32-5 The comment expresses concern regarding the requirement in Mitigation Measure 7.3a to remove snow from the corner of the project entrance and Alpine Meadows Road during a big snow year.

Please refer to Master Response 8 regarding snow storage, Master Response 11 regarding avalanche hazards, and response to comment F3-17.

F32-6 The comment questions if the County has performed a feasibility study regarding using fire resistant building materials and the proposed shelter-in-place strategy.

Please refer to Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter-in-Place.

F32-7 The comment states that climate models now predict different rain and snowfall patterns and seasonal melt-offs and that the Draft EIR does not consider how climate change may alter avalanche hazards.

Please refer to the discussion of changes in avalanche hazards due to climate change in Master Response 11.

F32-8 The comment expresses concern that snow removal on the slope below Road A could cause avalanches onto John Scott Trail.

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F32-14 The comment questions how it is possible to remove trees for defensible space and meet the requirements of the County's Tree Preservation ordinance.

Please refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

F32-15 The comment asserts that the noise analysis fails to evaluate the potential for construction noise over a 20-year buildout period and does not reflect the degree to which construction noise echoes through the valley. The comment inquires as to how mitigation measures will be enforced to ensure that noise levels are not significant, and states that construction activities should not be exempt from noise thresholds when those activities may occur over multiple years. The comment requests that noise level estimates at different conditions (different number of units per year under construction) be provided and that the construction noise analysis consider the effects of the use of large equipment to construct roads and bridges, and requests that noise from these construction activities be modeled to address summer impacts on the Bear Creek Association pond and neighborhood.

Please refer to Master Response 6, Noise.

F32-16 The comment asks for the basis of the County's determination that the proposed mitigation measures are adequate to address impacts related to disruptions, displacements, compaction, or overcrowding of the soil and whether the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c are based on Placer County's standard Conditions of Approval for development projects within the County and were developed based on a wide range of guidance documents, professional engineering standards, and the expertise of the County's Engineering and Surveying Department staff.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

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F32-17 The comment inquires whether the County has assessed if there is adequate area on suitable slopes on each proposed lot to accommodate permanent erosion control measures, if there is a need for stormwater treatment infrastructure on individual lots, and if the Lahontan Regional Water Quality Board agrees with the Draft EIR assessment of potential impacts and mitigation measures.

Mitigation Measures 11.2a through 11.2d and 11.4c each identify requirements related to erosion control while Mitigation Measures 11.4d through 11.4f, 12.1b, and 23.2a through 12.2d identify requirements related to stormwater treatment. This includes stormwater collection infrastructure to ensure that stormwater is routed to water quality treatment measures. In addition, as discussed in Master Response 7, Section 4.11 of the proposed Architecture Handbook (Draft EIR Appendix B3), requires that each individual lot includes temporary (construction period) and permanent BMPs in compliance with the County's guidelines.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions and does not recommend more study.

F32-18 The comment inquires whether the tree removal to create defensible space would lead to melting of snowpack and consequential increase in storm water runoff that may affect 100-year floodplains along the Truckee River.

Please refer to Master Response 7, Hydrology and Water Quality, regarding the potential changes in drainage due to vegetation removal.

Response to Comments Received at the Planning Commission Hearing

October 26, 2017

PC-1 Commenter Melissa Sig stated that constructing 40 to 50 homes would be too much because construction would occur for years and truck traffic passing her home would be constant.

Please refer to Master Response 4, Traffic.

PC-2 Commenter Melissa Sig stated that there is a housing crisis in the area and building recreation homes and only one employee residence will not help the problem, noting that recreation homes are vacant much of the time.

Mitigation Measure 4.1a states that, prior to recordation of each Final Map, the project shall prepare and receive approval of an employee housing plan in compliance with Placer County General Plan Policy C-2 which may consist of a combination of onsite housing, offsite housing, dedication of land needs, or in-lieu payments. With implementation of this mitigation measure, the project would provide for employee housing for 50% of the fulltime equivalent employees generated by the development.

PC-3 Commenter Melissa Sig identified a concern regarding cumulative impacts, noting that there is already expected to be decades of construction associated with the Village at Squaw Valley and Martis West.

Please refer to Master Response 6, Noise, regarding construction-related noise levels in Alpine Meadows valley and Master Response 12, Cumulative Scenario.

PC-4 Commenter Melissa Sig stated that noise from activities in the upper portions of the valley travels throughout the valley.

Please refer to Master Response 6, Noise.

PC-5 Commenter Melissa Sig stated she appreciates the need for more homes near Alpine Meadows, but that the long winding road will adversely affect trail usage.

Please refer to Master Response 1, Existing and Proposed Trail.

PC-6 Commenter Judy Bruner stated that the Draft EIR analysis relies on one day of traffic surveys during a low snowfall year and between 10:45 and 11:45 am, which is not usually the period with the highest amount of traffic.

Please refer to Master Response 4, Traffic, regarding the determination of the peak hour and the adjustments made to the traffic count data to reflect the current conditions at the time the environmental review for this project began.

PC-7 Commenter Judy Bruner stated that the Draft EIR fails to address White Wolf.

Please refer to Master Response 12, Cumulative Scenario.

PC-8 Commenter Judy Bruner stated that the Draft EIR fails to address cumulative traffic impacts on State Route 89 and the resulting impact on emergency response.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation.

PC-9 Commenter Judy Bruner stated that a yellow warbler was observed within the project site and stated that the mitigation measures requiring pre-construction surveys must also preclude construction/tree removal staring May 1 and that implementation of this measure will further lengthen construction period which will result in additional impacts associated with noise, air quality, disturbance to other wildlife, and construction traffic.

Please refer to Master Response 3, Biological Resources, regarding implementation of Mitigation Measure 6.5a and its potential effect on the construction schedule. As yellow warbler nesting does not usually begin before May 15, there is no need for pre-construction surveys before that date.

PC-10 Commenter Judy Bruner stated the Draft EIR states that County requires at least two points of vehicle access but the project only has a single access point. The proposed mitigation requiring fire resistant building material and shelter-in-place facilities will not prevent a loss of life. With one point of access, evacuation will not be feasible and will put existing residents at risk.

Please refer to Master Response 9, Fuel Management and Fire Safety, and Master Response 10 regarding the Shelter-in-Place facilities.

PC-11 Commenter Judy Bruner stated the Draft EIR excludes White Wolf which is a major flaw in the analysis and thus the Draft EIR must reconsider many topics including traffic, noise, and air quality.

Please refer to Master Response 12, Cumulative Scenario.

PC-12 Commenter Judy Bruner stated that it doesn't make sense for the cumulative noise impact to be significant but that the project would not create a cumulatively considerable contribution.

Please refer to Master Response 6, Noise, and Master Response 12, Cumulative Scenario.

PC-13 Commenter Judy Bruner stated the 40-plus homes will have a significant visual impact from the Five Lakes Trail as well as other vantage points in Alpine Meadows and the cumulative visual impact will be worsened with White Wolf.

Refer to Master Response 2 regarding the adequacy of the Draft EIR analysis of visual impacts. The visual simulation provided in Figure 5-4 demonstrates that when the requirements of the proposed Architecture Handbook (such as limits on building height and grading and requirements for use of particular building materials and colors) are implemented, the project would not result in a substantial change in the character of views from the Five Lakes Trail, thus the Draft EIR concludes that the project's contribution to cumulative visual impacts would be less than significant. Additionally, please refer to Master Response 12, Cumulative Scenario.

PC-14 Commenter Isaac Silverman, an attorney for Sierra Watch, stated that the traffic analysis relies on inaccurate existing traffic conditions and that the data collected in 2012 does not accurately reflect traffic during a normal snowfall year and typical ski resort operations. Additionally, the commenter states that the project site entrance is 150 feet from the Alpine Meadows ski parking lot and queues for getting into the parking lot extended all the way to State Route 89 multiple times in the 2016/2017 winter season.

Refer to Master Response 4 regarding the methodology and validity of the traffic impact study.

PC-15 Commenter Isaac Silverman stated that there are concerns regarding the shelter-in-place strategy in the event of wind-driven wildfire, especially at a personal level. The commenter also stated that the threshold of significance is unclear and it is unclear how the shelter-in-place facilities address the issue of only having a single point of access.

Please refer to Master Response 9, Fuel Management and Fire Safety, and to Master Response 10, Shelter-in-Place. The Emergency Preparedness and Evacuation Plan (updated version provided in Final EIR Appendix J3) recognizes that most residents would prefer to evacuate. However, the NTFPD has indicates that there are instances

where shelter in place is necessary (e.g., fire threat is not imminent at one location but is at another and roadways need to remain free-flowing to ensure orderly evacuation). The proposal to provide Shelter-in-Placer facilities allows people within the project site a viable option to protect themselves during a wildfire and allows NTFPD to most effectively manage the local and regional response to a fire.

PC-16 Commenter Isaac Silverman stated while it is understood that the White Wolf applications were received after publication of the Notice of Preparation (NOP), it is not logical from a planning perspective to exclude the project from the cumulative scenario. The commenter stated the cumulative impact analysis should be redone to include the White Wolf project because it would add 40 homes on the opposite side of Alpine Meadows Road and would result in similar impacts as the Alpine Sierra project.

Please refer to Master Response 12, Cumulative Scenario.

PC-17 Commenter Mary Coolidge stated the entrance to the proposed project is across the street from White Wolf, the proposed driveway requires a safety variance, and the White Wolf site is used for overflow parking. The commenter states that numerous projects will use Alpine Meadows Road including: Alpine Chalet, the parking lot, and the Alpine Sierra Subdivision. Lastly, the commenter states that the traffic analysis is not adequate because it doesn't reflect that Alpine Meadows Road is backed up numerous times per year and traffic is bad from 8:00 am to 11:30 am. The commenter stated that the traffic study should include multiple days.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario. The variance requested for the intersection of Road A and Alpine Meadows Road is a Design Exception, which would allow a variance from the County's standard intersection design requirements. Draft EIR page 7-17 notes that the proposed design includes sufficient pavement tapers would allow vehicles to enter and exit Road A without encroaching on other traffic lanes. Additionally, on pages 7-17 and 7-18, the Draft EIR finds that with implementation of Mitigation Measure 7.3a, there would be adequate sight distance along Alpine Meadows Road to allow for vehicles on Alpine Meadows Road to stop before striking an object (or side street vehicle) that comes into view at the access intersection. Furthermore, there is adequate sight distance for a driver turning onto Alpine Meadows Road from Road A to determine whether they can safely enter the roadway. This would ensure an appropriate level of safety at this intersection.

PC-18 Commenter Mary Coolidge stated that two points of access is required per County code.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 10, Shelter-in-Place, and response to comment PC-15 regarding the use of the shelter-in-place facilities in lieu of having a second point of access.

PC-19 Commenter Mary Coolidge stated that the cumulative analysis should consider 6 or 8 cars for each house that has 6 or 8 bedrooms and that more homes means more traffic.

Please refer to Master Response 4, Traffic, regarding the assumptions related to trip generation.

PC-20 Commenter Debbie Schneider stated she appreciated County staff maintain open communication with community members.

The commenter does not address the accuracy and adequacy of the Draft EIR or the project's environmental effects. No response is required.

PC-21 Commenter Debbie Schneider questions what the population saturation point for safe evacuation is in the Alpine Meadows valley. The commenter states that new projects will add 188 new cars on the road and states that the study is incorrectly based on the assumption that the new homes will be second homes when they could be primary residences. The commenter requests studies on the need for appropriate evacuation routes and two points of access.

Please refer to response to comment PC-15 regarding the use of the shelter-in-place facilities in lieu of having a second point of access, Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, and Master response 10, Shelter-In-Place.

PC-22 Commenter Debbie Schneider stated there needs to be a Valley-wide emergency alert system that is not reliant on internet or cell phones.

Please refer to the discussion of the communication system that has been added to the proposed Emergency Preparedness and Evacuation Plan in Master Response 5, Emergency Response and Evacuation.

PC-23 Commenter Debbie Schneider stated that the shelter in place will also include 1,000 gallons of diesel fuel.

Please refer to Master Response 10, Shelter-in-Place.

PC-24 Commenter Debbie Schneider stated that the new fire engine should be stationed at Alpine Meadows and the new station should be manned 24/7 without dependence on grants.

Please refer to the discussion of fire hazard reduction in Master Response 5, Emergency Response and Evacuation.

PC-25 Commenter Debbie Schneider stated that there should not be any outdoor fire pits, even those fueled by propane.

Please refer to Master Response 9 regarding the requirements for fire pits as provided in the Architecture Handbook (Draft EIR Appendix B3) and the vegetation management requirements in the Alpine Sierra Forest Management and Fuel Reduction Plan (updated version provided in Final EIR Appendix J2).

PC-26 Commenter Debbie Schneider stated that there should be a permanent prohibition of on-street parking onsite.

Parking is evaluated in Draft EIR Impact 7.5 on pages 7-23 and 7-24. The proposed width of Road A is not sufficient to allow on-street parking. The impact analysis states that Alternative A "does not include driveways that would be large enough to provide four off-street parking spaces for each dwelling unit, particularly for the halfplex units. It is anticipated that Alternative A could result in insufficient parking that could lead to parking in the street." For Alternative B, the project applicant prepared a Parking Provision and Management Plan (Appendix E). The Draft EIR states that Alternative B would provide "parking through a combination of: additional surface parking within most lots, common parking lots in the project, and additional garage space," with three-car garages provided in most of the lots on the eastern side of the project site while "on-street parking would be accommodated on Court B by providing a minimum roadway width of 32 feet."

PC-27 Commenter Rachelle Latimer stated that she appreciates that the staff worked with the applicant to develop Alternative B and to have open lines of communication.

The commenter does not address the adequacy or accuracy of the Draft EIR or the project's environmental effects, thus no response is required.

PC-28 Commenter Rachelle Latimer stated that the EIR is inadequate with regards to hazards and traffic.

Please refer to Master Response 4, Traffic, Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 11, Avalanche Hazards.

PC-29 Commenter Rachelle Latimer stated that the Draft EIR states that no new information received subsequent to public review of the NOP, but the County received applications for the Village at Squaw Valley, the gondola project, and White Wolf subsequent to the NOP and these will impact Alpine Sierra and the Alpine Meadows valley.

Please refer to Master Response 12, Cumulative Scenario.

PC-30 Commenter Rachelle Latimer stated that the comments on the NOP were ignored.

The comments received on the NOP are summarized at the beginning of each impact analysis chapter and were considered during preparation of the impact analysis. CEQA does not require a formal response to NOP comments. The commenter did not identify any specific comments that were ignored.

PC-31 Commenter Rachelle Latimer identified concerns regarding traffic patterns and safety.

Please refer to Master Response 4, Traffic, and Master Response 5, Emergency Response and Evacuation.

PC-32 Commenter Rachelle Latimer identified concerns regarding snow removal, onsite storage, and hydrological changes to neighboring properties.

Please refer to Master Response 7, Hydrology and Water Quality, and Master Response 8, Snow Storage.

PC-33 Commenter Rachelle Latimer stated that there are level of service F conditions on Alpine Meadows Road.

Please refer to Master Response 4, Traffic.

PC-34 Commenter Rachelle Latimer requested an updated traffic analysis.

Please refer to the discussion comparing the traffic volumes used in the traffic impacts analysis to current traffic volumes in Master Response 4, Traffic.

PC-35 Commenter Rachelle Latimer stated that the visual impacts analysis is weak with regards to the Five Lakes Trail.

Refer to Master Response 2 regarding the adequacy of the Draft EIR analysis of visual impacts and the methodology used in preparation of the visual simulation. The visual simulation provided in Figure 5-4B demonstrates that when the requirements of the proposed Architecture Handbook (such as limits on building height and grading and requirements for use of particular building materials and colors) are implemented, the project would not result in a substantial change in the character of views from the Five Lakes Trail.

PC-36 Commenter Rachelle Latimer stated that the Draft EIR needs to address water resource impacts, especially groundwater recharge, and impacts to Bear Creek. Additionally, the commenter states that there is no site-specific analysis, only generic Best Management Practices and insufficient analysis.

Please refer to Master Response 7, Hydrology and Water Quality.

PC-37 Commenter Rachelle Latimer stated that limiting construction to August and October due to the yellow warbler will significantly increase the construction time period. Additionally, the commenter questioned how it would be possible to create defensible space through tree removal and meet County's tree ordinance.

Refer to Master Response 3, Biological Resources regarding the effect of Mitigation Measure 6.5a on construction activities and response F3-9 regarding the potential effects of a lengthened construction period. Please also refer to Master Response 3, Biological Resources, regarding the consistency of creating and maintaining defensible space in accordance with the Forest Management and Fuel Reduction Plan (Final EIR Appendix J2) with the County's Tree Preservation ordinance and Master Response 9, Fuel Management and Fire Safety.

PC-38 Commenter Rachelle Latimer identified concerns regarding runoff to Bear Creek and its impact on fish due to a long construction period.

Please refer to Master Response 7, Hydrology and Water Quality. The Low Impact Design requirements and Best Management Practices discussed in that Master Response would be applied to all construction activities within the project site, regardless of the length of the construction period. These measures would ensure that the project does not increase stormwater run-off from the site and that all run-off is routed through appropriate and effective water quality treatment measures. Thus the project would not result in adverse effects to fish in Bear Creek and the Truckee River.

PC-39 Commenter Rachelle Latimer stated concerns regarding the feasibility to construct adequate water quality measures.

Please refer to Master Response 7, Hydrology and Water Quality.

PC-40 Commenter Rachelle Latimer stated concerns regarding earlier snowpack melting due to climate change which will impact regional creeks, streams, etc.

As discussed in Master Response 7, Hydrology and Water Quality, the project would not result in changes in drainage and runoff or other adverse effects to creeks and streams. Changes in snow accumulation and snowmelt due to climate change would not be caused by the proposed project.

PC-41 Commenter Rachelle Latimer questioned if the Regional Water Quality Control Board agreed with the EIR.

The Lahontan Regional Water Quality Board responded to the Notice of Preparation for this EIR with a detailed list of their concerns and the analysis that needed to be provided in the EIR. In the process of preparing the Draft EIR, their comments were addressed directly. The Draft EIR was circulated to the Lahontan Regional Water Quality Control Board, which did not submit any comments. As such, it is reasonable to infer that the Lahontan Regional Water Quality Control Board agrees with the Draft EIR analysis and conclusions.

PC-42 Commenter Rachelle Latimer identified concerns regarding whether the County has adequate resources to be sure mitigation measures are implemented in a timely manner.

Please refer to the discussion of mitigation measure implementation in Master Response 2, Visual Resources, and Master Response 3, Biological Resources. The County typically ensures implementation of most mitigation measures through the Improvement Plan review and issuance of grading and building permits.

PC-43 Commenter Bob Treetoe stated that the County has provided a very complete process and the EIR is much larger in scope than his experience with the U.S. Forest Service 40 years ago.

The commenter does not address the adequacy or accuracy of the Draft EIR or the project's environmental effects. No response is required.

PC-44 Commenter Bob Treetoe stated that breaking analysis into individual subjects misses things.

The comment does not specifically address the project's environmental effects. The format of the Draft EIR is consistent with the industry standard for CEQA compliance.

PC-45 Commenter Bob Treetoe stated that proposed Road A is near his home on John Scott Trail and states that snow removal will be an issue due to the fact that the road is big and wide, with retaining walls uphill. The commenter raises avalanche concerns over the very steep land between Road A and John Scott Trail and the identified Potential Avalanche Hazard Area in this location. The commenter states that John Scott Trail is substandard and this is not addressed in the EIR. The commenter states that snow removal onto John Scott Trail will block egress for the residents in the upper valley of the Bear Creek Association.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 8, Snow Storage, and Master Response 11, Avalanche Hazards. It is not expected that snow storage along Road A would expose John Scott Trail to avalanche hazards.

PC-46 Commenter Bob Treetoe stated that the fire station is not staffed 24/7; it is operated under an ad hoc agreement and grants. Additional emergency response comes from Squaw Valley. The commenter states that the area is an over-burdened and fuel rich environment and the project approach to these issues is a band-aid solution.

Please refer to Master Response 5, Emergency Response and Evacuation, and Master Response 9, Fuel Management and Fire Safety**.**

PC-47 Commenter Bob Treetoe stated that the shelter-in-place strategy and donation of a single fire engine are not sufficient and that no one knows the disposition of that engine. The commenter raises concerns regarding on-site fire training for the Homeowner's Association staff.

Please refer to Master Response 5, Emergency Response and Evacuation, Master Response 9, Fuel Management and Fire Safety, and Master Response 10, Shelter in Place.

PC-48 Commenter Bob Treetoe stated concerns regarding traffic from Chalet Road, White Wolf, Alpine Meadows, parking and gondola, which are not discussed in the EIR. The commenter states that the EIR does not provide solutions to the slight impacts to the intersections of White Wolf and Alpine Sierra at Alpine Meadows Road. The commenter also states that the traffic study is inadequate because it uses data from

2012 and extrapolated into 2014 but does not include 2018 conditions nor those over a 20 year buildout.

Please refer to Master Response 4, Traffic, and Master Response 12, Cumulative Scenario. Additionally, as stated on Draft EIR page 7-17 the spacing between the Alpine Sierra project site entrance and the White Wolf subdivision entrance meets the requirement in Section 4.05(h) of the Placer County Land Development Manual (Placer County 2006) that streets "entering on opposite sides of any given street shall have their centerline directly opposite or shall be offset by at least 150 feet." Please also refer to response to comment F4-17.

PC-49 Commenter Michael Wilson, who owns a home on John Scott Trail, asked when enough is enough and how much more is needed. The commenter states that the Alpine Meadows community should be limited to the existing footprint and should not build out more. Additionally, the commenter stated that efforts should be directed towards improvement traffic flow.

The commenter does not address the adequacy or accuracy of the Draft EIR or address specific environmental effects of the proposed project. No response is required.

PC-50 Commenter Michael Wilson recommended finding another spot through a land swap that would allow construction/improvement within an existing developed area because people live in the area in order to escape the city environment.

Consideration of an off-site project alternative is provided in Draft EIR Section 16.7.3.4.

PC-51 Commenter Michael Wilson stated that noise travels in the valley as he can hear weddings, snow making, and nails being hammered.

Please refer to Master Response 6 regarding noise impacts, including construction noise.

PC-52 Commenter Ernest Werthheim stated that past planning work in Bear Creek Valley focused on native plant propagation.

The commenter does not address the adequacy or accuracy of the Draft EIR or the project's environmental effects and no response is required.

PC-53 Commenter Ernest Werthheim commended County staff for their good work and communication.

The commenter does not address the adequacy or accuracy of the Draft EIR or the project's environmental effects and no response is required.

CHAPTER 3
TEXT REVISIONS TO THE DRAFT EIR

This chapter provides those pages from the Draft EIR on which text revisions or additions were made. The revisions are shown in blue font for new text and red strikethrough font for deleted text.

Timberland Conversion Permit and Timber Harvest Plan

The project would remove a crop of trees of commercial species and California Code of Regulations Section 1103 and Public Resources Code section 4581 require that the project applicant file a Timber Harvest Plan and obtain a Timberland Conversion Permit from the California Department of Forestry and Fire Protection.

Streambed Alteration Agreement

Construction of on-site roads would require four stream crossings. Where these activities affect the bed, bank, or channel of streams, the project applicant must obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) pursuant to Section 1602 of the California Fish and Game Code. CDFW jurisdiction extends from the top-of-bank to top-of-bank, or to the outside edge of riparian vegetation, whichever is greater. The Streambed Alteration Agreement is developed by CDFW in consultation with the applicant or applicant's representative, and identifies mitigation measures that must be implemented to minimize impacts to stream channels and riparian vegetation.

2.9 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impacts and mitigation measures are identified throughout Chapters 4 through 16 of this Draft EIR. Table 2-2, Environmental Impact Report Impacts Summary, lists all of the impacts associated with Alternative A and Alternative B as determined in this EIR. The table identifies the level of significance of each impact and presents the mitigation measures necessary to reduce impacts to a less-than-significant level. ~~Although~~ With implementation of the mitigation measures ~~have been~~ identified throughout Chapters 4 through 16, all of the project's significant and potentially significant impacts would be ~~to~~ reduced to less-than-significant levels and ~~impacts to the extent feasible,~~ the project would result in ~~six~~ no significant and unavoidable impacts.

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		MM 12.1a–MM 12.1c, MM 12.2a–MM 12.2c, and MM 12.5a–MM 12.5c (see Hydrology and Water Quality for full text of mitigation measures) **MM 13.2a, MM 13.2b, and MM 13.3a** (see Hazards and Hazardous Materials for full text of mitigation measures) **MM 14.1a–MM 14.1c and MM 14.7a** (see Public Services and Utilities for full text of mitigation measures)	
Impact 4.3: Would the project result in development of incompatible uses and/or creation of land use conflicts	LTS	None required.	LTS
Impact 4.4: Would the project result in alteration of the present or planned land use of the area?	LTS	None required.	LTS
Visual Resources			
Impact 5.1: Would the project adversely affect a scenic vista?	S	**MM 5.1a**: The project applicant shall implement MM 11.2c, which requires the applicant to prepare and submit Improvement Plans which must be approved by Placer County prior to recordation of each Final Subdivision Map. **MM 5.1b**: Stockpiling of materials on site shall be minimized during construction. Construction staging areas and stockpile storage locations shall be identified on project Improvement Plans and shall be located within existing disturbed areas, as close to or within the areas of construction as possible, and as far as practical from existing dwellings and protected resources in the area. Material stockpiles shall be located to screen views of staging areas from Five Lakes Trail, Alpine Meadows Road, John Scott Trail, and Chalet Road to the extent feasible. A note stating this information shall be included on the Improvement Plans to the satisfaction of the Planning Services Division. **MM 5.1c**: The ~~Implementation~~ Improvement Plans shall show that all grade cuts shall be revegetated and/or shall be stabilized with retaining walls constructed from natural or natural-appearing materials to the satisfaction of the Planning Services Division. **MM 5.1d**: The Improvement Plans shall show that all guard rails and other roadway safety features shall be constructed using materials that mimic rusted steel to the satisfaction of the Planning Services Division.	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		MM 5.1e: The project applicant and all developers of individual lots shall implement the proposed Development Standards regarding setbacks, building envelopes, maximum lot coverage, grading and drainage improvements, and vegetation removal to ensure that site development minimizes alterations to existing topography and vegetation to the extent feasible. Prior to recordation of each Final Subdivision Map, a reference manual (i.e., development notebook) shall be submitted for approval to the Planning Services Division which shall include plot plans for each lot in the project, depicting all dimensions, easements, setbacks, height limits, no access strips and other restrictions which might affect the construction of structures on said lot and the permitted lot coverage per Placer County Zoning Ordinance Section 17.54.100.A.2.e. No Building Permits may be issued for the project until this manual is provided to and accepted by the Development Review Committee for format and content requirements.	
Impact 5.2: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	S	**MM 5.2a:** The project applicant shall implement MM 5.1a through MM 5.1e. These measures regulate locations of construction material staging areas, content and approval requirements for Improvement Plans, treatment of grade cuts, and material selections for guard rails and other roadway safety features to the satisfaction of the Planning Services Division, and require that all future development on the site comply with the proposed Development Standards.	LTS
Impact 5.3: Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	S	**MM 5.3a:** Prior to recordation of the first Final Map the project applicant shall modify the ~~Development Standards~~ Architecture Standards to include the following Dark Sky Society recommendations: • Full cutoff and fully shielded fixtures shall be used, • Freestanding street lighting shall be limited to that necessary to meet roadway safety requirements • Compact fluorescent (2300K), LED (3000K or less), or High Pressure Sodium is recommended unless the light is motion sensor activated, in which case incandescent or the instant start compact fluorescent bulbs can be used. Metal halide (due to its higher costs, energy use, impact on the environment, and greater contribution to "sky glow") is discouraged	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		MM 6.1c: To protect any individuals or populations of Sierra Nevada yellow-legged frogs (SNYLF), the project applicant shall undertake the following surveys, monitoring, and construction management practices: A. Prior to the issuance of grading permits or improvement plans for construction of subdivision improvements, a U.S. Fish and Wildlife Service (Service)-approved biologist shall conduct a visual encounter survey (VES) for adult/metamorph SNYLF within all suitable aquatic habitats within the project site. The VES shall be conducted according to A Standardized Approach for Survey Aquatic Amphibians (Fellers and Freel 1995). Since breeding habitat does not exist within the site, the VES shall be conducted during the summer at a time where post-breeding adults and newly metamorphosed SNYLF are determined to be the most easily observed. The optimal dates for surveys may vary from year to year dependent on precipitation and snowpack; therefore dates of surveys will be approved in advance by the Service. At least two weeks prior to conducting this survey, the project proponent shall submit a Survey Plan to the Service for approval, which shall include the timing of the VES, where on the property the survey would be conducted, and the credentials of the biologist(s). The project proponent shall submit a report of the VES results to the County, Service, and California Department of Fish and Wildlife (CDFW). This initial survey will establish a baseline for the likely presence or absence of SNYLF may be conducted in any calendar year. If the initial VES is conducted in the same calendar year as project construction it will fulfill survey requirements of both parts a and b of this mitigation measure. B. In the first calendar year subsequent to the initial VES, required in part A above, in which ground-disturbing construction activity will occur at any time between July 15 and the date that continuous surface flow in the unnamed seasonal creek has substantially ceased (over at least 50% of its length within the site), or if construction work that began before July 15 will continue into this period, a Service-approved biologist shall conduct a pre-construction VES as specified in part A of this mitigation measure. Results of the survey shall be reported to the County, Service, and CDFW a minimum of two weeks prior to commencement or continuation of any construction activity after July 15. Within 100 feet of surface water, construction activity that	

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		began before July 15 would need to be discontinued for the year or suspended until the survey is completed, the report delivered, and two weeks allowed for agency review prior to recommencement of work within 100 feet of surface water. C. In the event that no SNYLF are found in any surface water bodies within the site, no further mitigation is required, and no further survey or mitigation is required until the fourth year after the year of the negative survey results from a pre-construction survey. D. In the event that SNYLF are detected within the site, a biological monitor with experience with SNYLF shall be present on site during any and all times that construction equipment would be operated within 100 feet of surface water in any water body on site, including Bear Creek and the unnamed seasonal creek, and shall examine all areas of possible equipment operation within 100 feet of surface water to ensure that no SNYLF are present. If SNYLF are observed further than 5 feet from the water, no equipment operation is permitted within 100 feet of the location of such observation on that day. E. A biological monitor is not required for construction activity that occurs further than 100 feet from surface water or outside the period from July 15 through substantial cessation of flow in the unnamed seasonal creek, except within 100 feet of Bear Creek where, in the event that SNYLF are detected within the site, a biological monitor is required during any construction activities from July 15 (or the date of detection) through the onset of winter. ~~A.~~F. A biological monitor is not required for construction activity (e.g. construction of homes) that occurs further than 82 feet from surface water or outside the period from July 15 through substantial cessation of flow in the seasonal creek or within four years of a negative survey result. During construction on any of the following proposed Lots: 3, 4, 5, 6, 7, 8, 14, 15, 16, 25, 26, 27 and 28; if ground disturbing phases of home construction would occur within 82 feet of the unnamed seasonal stream after July 15, a biological monitor shall be required during any construction activities from July 15 (or the date of detection) through the onset of winter.	

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact 6.2: Would the project result in substantial habitat reductions affecting wildlife and plant populations?	PS	**MM 6.2a:** The Improvement Plans shall show that all bridges constructed for the proposed project shall be designed and built using a clear span technique that avoids permanent or temporary impacts to perennial or seasonal streams. Wherever feasible, bridges shall be designed so that no fill shall be placed, and no construction activities shall occur within the ordinary high water mark of a perennial or seasonal stream. **MM 6.2b:** The project applicant shall submit a riparian habitat protection plan for review and approval by the Placer County Planning Services Division prior to approval of Improvement Plans for construction of bridges. The plan shall include architectural plans for each of the proposed bridge spans, shall detail any construction activities that may occur within the 50-foot seasonal or the 100-foot perennial riparian buffer, and specify best management practices (BMPs) that will be implemented to minimize impacts to riparian habitat. In the event that construction activities result in the removal or damage of any riparian habitat, the plan shall outline a restoration program to restore the riparian habitat at a 1:1 ratio in place or to create, restore, or conserve habitat of similar qualities and characteristics as the habitat lost to development through a compensatory program as approved by the Planning Services Division that provides for wetland mitigation in the Sierra Nevada and the Tahoe-Truckee regions and has been approved by the California Department of Fish and Wildlife. The compensatory mitigation for this project may include establishment of riparian vegetation, enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the riparian corridors. **MM 6.2c:** The project applicant shall comply with the California Department of Fish and Wildlife's Lake and Streambed Alteration Program (California Fish and Game Code Sections 1600–1616), including notification, submission of all required plans and documents, and payment of required fees to the California Department of Fish and Wildlife to confirm that bridge construction activities do not result in substantial effects related to the obstruction, diversion, or introduction of debris into any river or stream. Prior to approval of Improvement Plans for any portion of the project that would construct improvements that could affect the bed or bank of a stream, the applicant shall furnish to the Development Review Committee (DRC) evidence that the CDFW has been notified. If permits	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		are required, they shall be obtained and copies submitted to DRC prior to issuance of Improvement Plans.	
Impact 6.3: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community?	PS	**MM 6.3a:** The project applicant shall implement MM 6.2a to ensure that bridge design avoids permanent or temporary impacts to perennial or seasonal streams. **MM 6.3b:** The project applicant shall implement MM 6.2b, which requires submittal of a riparian habitat protection plan and restoration program prior to approval of Improvement Plans. **MM 6.3c:** The project applicant shall implement MM 6.2c, which requires compliance with the CDFW Lake and Streambed Alteration Program to ensure that bridge construction activities do not result in substantial effects related to the obstruction, diversion, or introduction of debris into any river or stream.	LTS
Impact 6.4: Would the project have a substantial adverse effect on federally protected wetlands?	PS	**MM 6.4a:** Prior to Improvement Plan approval, the applicant shall furnish to the DRC evidence that the U.S. Army Corps of Engineers has been notified by certified letter regarding the existence of wetlands and~~,~~ streams~~, and/or vernal pools~~ on the property. Prior to Improvement Plan approval, if permits are required, they shall be obtained and copies submitted to DRC. Any clearing, grading, or excavation work shall not occur until the Improvement Plans have been approved. **MM 6.4b:** Prior to Improvement Plan approval or recordation of the Final Subdivision Map(s) or issuance of a Building Permit, where off-site mitigation has been determined to be acceptable for compensation of wetland/riparian impacts the project applicant shall provide mitigation as follows: A. Provide written evidence of payment that compensatory habitat has been established through the purchase of mitigation credits at a County-qualified wetland mitigation bank. Evidence of payment shall describe the amount and type of habitat purchased at the bank site. The amount of money required to purchase credits shall be equal to the amount necessary to replace wetland or riparian habitat acreage with habitat qualities and values that are comparable to the habitat lost due to development~~.~~ ~~Evidence of payment shall describe the amount and type of habitat purchased at the bank site and resource values~~ including compensation for temporal loss. Evidence of payment, which describes the amount and type of habitat	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		purchased at the bank site, must be provided to the County prior to issuance of Improvement Plan. B. Construct and/or restore wetland and/or riparian habitat in an off-site location acceptable to Placer County and any state or federal resource agency with jurisdiction over the habitat, with the replacement habitat designed to achieve qualities and values that are comparable to the habitat lost due to development including compensation for temporal loss. A wetland/riparian mitigation plan shall be reviewed and approved by Placer County and any affected state or federal resource agency prior to initiation of construction of any compensatory habitat. C. Provide a combination of mitigation bank credit purchase and off-site construction as outlined above.	
Impact 6.5: Would the project interfere substantially with wildlife movement or native wildlife nursery sites?	PS	**MM 6.5a:** The Improvement Plans shall include the following note requiring a nesting bird survey and shall show placement of all protective fencing for those trees identified for protection within the survey: Prior to any grading or tree removal activities, a focused survey for nesting birds shall be conducted by a qualified biologist during the nesting season (March 1–September 1). A report summarizing the survey shall be provided to Placer County and the California Department of Fish and Wildlife (CDFW) within 30 days of the completed survey. If an active nest is identified, appropriate mitigation measures shall be developed and implemented in consultation with CDFW. If construction is proposed to take place between March 1 and September 1, no construction activity or tree removal shall occur within 500 feet of an active nest (or greater distance, as determined by the CDFW). Construction activities may only resume after a follow up survey has been conducted and a report prepared by a qualified biologist indicating that the nest (or nests) are no longer active, and that no new nests have been identified. A follow-up survey shall be conducted 2 months following the initial survey, if the initial survey occurs between March 1 and July 1. Additional follow up surveys may be required by the DRC, based on the recommendations in the raptor study and/or as recommended by the CDFW. Temporary construction fencing and signage as described herein shall be installed at a minimum 500-foot radius around trees containing active raptor nests and a minimum 100-foot radius around trees containing migratory bird nests. Nesting bird surveys shall occur between 7 and 14 days prior to initiation of construction. Nesting surveys shall be conducted between dawn and 11:00 a.m. Survey work shall cover all habitat within 100 feet of vegetation removal or ground	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		disturbance, or 500 feet from the limit of disturbance in the case of raptor/owl surveys. In the event that nests are identified, temporary non-disturbance zones shall be the same width as the survey buffer (100 to 500 feet, depending on the species found to be nesting), and a revisit by the biologist, with confirmed observations of fledglings in the nest vicinity, shall be required prior to vegetation removal or soil disturbance, unless this were to be delayed until after August 15. **MM 6.5b:** Prior to approval of Improvement Plans for any portion of the project that would remove trees or vegetation, the applicant shall furnish to the DRC a Vegetation Management Plan prepared by a Registered Professional Forester that evaluates tree/vegetation removal, identifies trees with disturbance to their critical root zone, addresses fuel load and fire hazard reduction, and specifies tree planting designed to enhance wildlife habitat, aesthetic quality, and forest health. The applicant shall provide to the DRC an implementation plan that demonstrates compliance with recommendations of the Vegetation Management Plan.	
Impact 6.6: Would the project conflict with local policies or ordinances protecting biological resources, such as tree preservation policy?	PS	**MM 6.6a:** The project applicant shall implement MM 6.5b, which requires that the applicant furnish to the DRC a Vegetation Management Plan documenting tree protection measures to be implemented on site prior to approval of Improvement Plans. **MM 6.6b:** The project applicant shall implement MM 6.5a, which requires that the applicant obtain appropriate permits for impacts to wetlands and riparian vegetation from the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife prior to approval of Improvement Plans.	LTS
Impact 6.7: Would the project involve changes in the existing environment which, due to their location or nature, could result in the loss or conversion of forest land to non-agricultural or non-forest use?	LTS	**MM 6.7a**: Prior to approval of Improvement Plans the applicant shall confer with the California Department of Forestry and Fire Protection (CalFire) to determine if a Timber Harvest Plan (THP) is required. If a THP is required the plan must be approved prior to ~~issuance~~ approval of Improvement Plans. Evidence of CalFire's written determination shall be provided to the Planning Services Division.	LTS
Transportation and Circulation			
Impact 7.1 Would the project result in an increase in traffic that is substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system?	LTS	None required.	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		facilities. This information shall be shown on the information sheet of the Final Map and shall be incorporated into the project CC&R's.	
Impact 12.3: Would the project substantially alter drainage patterns; increase rate or amount of surface runoff; require construction of new stormwater drainage facilities or expansion of existing facilities?	PS	**MM 12.3a:** The Improvement Plans shall indicate construction of a new on-site stormwater drainage system that shall discharge to either an existing swale or channel or to an erosion control device designed to create a sheet flow condition **MM 12.3b:** The Improvement Plan submittal and final Drainage Report shall provide details showing that storm water run-off shall be reduced to pre-project conditions at all discharge points from the property. The ESD may, after review of the project final drainage report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. Increased flows directly into Bear Creek shall be no more than 2 cubic feet per second. Retention/detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division (ESD) and shall be shown on the Improvement Plans. Maintenance of detention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.	LTS
Impact 12.4: Would the project place housing or improvements within the 100-year floodplain and place housing within a 100-year floodplain that would impede or redirect flood flows?	PS	**MM 12.4a:** On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s), show the limits of the future, unmitigated, fully developed, 100-year flood plain (after grading) for Bear Creek and the un-named tributary on the east side of the project and designate same as a building setback line unless greater setbacks are required by other conditions contained herein. **MM 12.4b:** On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s) show finished house pad elevations to be a minimum of two feet above the 100-year floodplain line (or finished floor -three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying ~~Department~~Division. This certification shall be done prior to construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by the Engineering and Surveying ~~Department~~ Division and approved by the	LTS

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		MM 13.1b: The project applicant shall implement Mitigation Measures 14.1a and 14.1b requiring the applicant to submit will-serve letters from the North Tahoe Fire Protection District and Alpine Springs County Water District to Placer County prior to recordation of the Final Map, to purchase and donate and pumper truck to the North Tahoe Fire Protection District, and to make a fair-share contribution to the Alpine Springs County Water District toward the cost of upgrading three system-wide pump stations. **MM 13.1c:** Under Alternative A, the project shall prepare and implement an Emergency Preparedness and Evacuation Plan (EPEP). The EPEP shall establish requirements for the following: • Maintenance of internal roads by the Homeowners Association (HOA), • On-site storage of snow removal equipment, • Use of fire-resistant building materials for home construction, • Minimum standards to be met such that homes can be used as Shelter-in-Place facilities for project occupants, • Fuel reduction treatment and management of the entire project site, and • Recordation of easements for emergency vehicle access through the project site to United States Forest Service (USFS) property boundaries in two locations to allow for a connection through USFS lands in the future should the USFS determine that looped access throughout Bear Creek Valley could be provided. Under Alternative B, the project shall implement the proposed EPEP, which addresses maintenance of internal roads, on-site storage of snow removal equipment, use of fire-resistant building materials for home construction, minimum standards that will allow for the HOA facility to be used as a Shelter-in-Place facility, fuel reduction, and recordation of easements for emergency vehicle access through the project site. Under either alternative, prior to approval of Improvement Plans for each project phase, the applicant shall receive final approval from the Planning Services Division of an Emergency Preparedness and Evacuation Plan (EPEP) to detail the specific emergency preparedness measures incorporated into the project phase. Physical improvements of the EPEP, such as directional signage, shall be shown on the Improvement Plans. Additionally, under either alternative, the first phase EPEP must specify that if an avalanche occurs that affects Alpine Meadows Road and Road A, the HOA must hire a private contractor to clear the avalanche	

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
		from the onsite private roadway.~~The project shall implement the Emergency Preparedness and Evacuation Plan. Prior to approval of Improvement Plans for each project phase, the applicant shall receive final approval from the Planning Services Division of an Emergency Preparedness and Evacuation Plan (EPEP) to detail the specific emergency preparedness measures incorporated into the project phase. Physical improvements of the EPEP, such as directional signage, shall be shown on the Improvement Plans.~~ **MM 13.1d:** Prior to recordation of each Final Subdivision Map, Conditions, Covenants, and Restrictions (CC&Rs) shall be prepared and submitted for review and approval by the Engineering and Surveying Department, County Counsel, and other appropriate County Departments. CC&Rs shall be recorded concurrently with the filing of the Final Subdivision Map and shall contain notifications for the provision of an Emergency Preparedness and Evacuation Plan (EPEP). The provision shall specify, at a minimum, that the EPEP shall be provided to each property owner upon the sale of any lot or improved lot in this subdivision and that ongoing implementation of the EPEP shall be the responsibility of the Homeowners' Association.	
Impact 13.2: Would the project expose people or structures to significant risk of loss, injury, or death involving avalanches?	PS	**MM 13.2a:** Prior to recordation of the first small lot Final Map that includes any residential lot in the eastern development pod, the project applicant shall purchase snow removal equipment, which at a minimum shall include a rubber tired, 4-wheel drive, front-end loader with a minimum 1.5-yard bucket capacity. The snow removal equipment shall be housed within the homeowners' association (HOA) caretaker unit on site. The HOA shall submit evidence annually to the Placer County Planning Division verifying that a full-time HOA caretaker qualified to conduct snow removal activities has been retained and is residing on site. **MM 13.2b:** Prior to the issuance of grading/building permits on Lots 2 and 3, the project engineer shall revise the site plans to ensure that the design of Lots 2 and 3 comply with the recommendations found in the Avalanche Hazard Study. These recommendations include avoidance of the small avalanche path on site or the incorporation of the rock outcropping into the structural design of these lots to hinder snow buildup on the rock. The design of Lots 2 and 3 shall comply with Section 12.40.060 of the Placer County Code.	LTS
Public Services and Utilities			

Table 2-2
Environmental Impact Report Impacts Summary

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Impact 15.7: Would the project result in cumulative impacts on air pollutant emissions?	S	**MM 15.7a:** Prior to ~~issuance of Grading permits~~approval of Improvement Plans, the applicant shall provide a written calculation to the Placer County Air Pollution Control District (APCD) for approval demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used during the grading phases of the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20% oxides of nitrogen (NOx) reduction as compared to the California Air Resources Board statewide fleet average emissions. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The Construction Mitigation Calculator available at the following link shall be used to calculate compliance with this condition: http://www.airquality.org/ceqa/mitigation.shtml. The completed calculator worksheet shall be submitted to the Placer County APCD prior to the start of construction.	LTS
Impact 15.8: Would the project result in cumulative impacts on GHG emissions?	LTS	None required.	LTS
Impact 15.9: Would the project result in cumulative impacts associated with the rate or amount and water quality of surface runoff?	LTS	None required.	LTS
Impact 15.10: Would the project result in cumulative impacts associated with increased risks of wildfire?	LTS	None required.	LTS
Impact 15.11: Would the project result in cumulative impacts associated with the provision of public services (police, fire, schools)?	LTS	None required.	LTS
Impact 15.12: Would the project result in cumulative impacts associated with the provision of public utilities (solid waste collection/disposal, wastewater collection and treatment, water supply)?	LTS	None required.	LTS

include construction of a public pedestrian trail to connect to the existing USFS trail that traverses the project site. The amenities lot is proposed to be located on Lot K adjacent to Lot 5 as shown on Figures 3-4 and 3-5.

Additionally Alternative A includes a fuel management program (Appendix J) to maintain defensible space throughout the project site, and Chapter 7A of the California Building Code will require interior building sprinklers for all habitable structures constructed on site in addition to other fire safety compliance measures such as use of non-combustible exterior building materials and implementation of defensible space. As discussed in Chapter 13, Hazards and Hazardous Materials, the applicant would be required to prepare and implement an Emergency Preparedness and Evacuation Plan for Alternative A to ensure the safety of the proposed residents.

3.4.2 Circulation

Alternative A proposes an entrance off Alpine Meadows Road on the western side of the project site. Circulation through the project site would be provided by this main road extending east from the entrance and terminating in a cul-de-sac. Three secondary roads (cul-de-sacs) would intersect the main road to provide access to proposed lots. Roads are proposed to be privately owned and maintained by the HOA. Looped or secondary access to the project site is not available from adjacent properties, but the project would include access easements through the project site to USFS property boundaries in two locations to allow for a connection through USFS lands in the future should the USFS determine that looped access throughout Bear Creek Valley could be provided. These easements are labeled as Emergency Vehicle Access (EVA) easements on Figures 3-4 and 3-5 and on the Tentative Subdivision Map provided in Appendix B. One is located along the southern property boundary in the western development pod; the other is located along the northern property boundary in the eastern development pod. In addition to roads, a public pedestrian trail would be constructed on site as part of the proposed project, connecting with the existing USFS trail that traverses the project site.

3.4.3 Utilities

Alternative A would require construction of new infrastructure to provide water, wastewater, electricity, telephone, and cable television services to the site. Underground utilities would be constructed in easements along roadways within the development. Domestic water would be supplied from the Alpine Springs County Water District (ASCWD). Wastewater collection ~~disposal~~ would also be provided by ASCWD. Most of the homes would use gravity sewer, but a few would require individual sewage pumps to access the gravity sewer. One sewer lift station would be required and would be constructed in the northeastern corner of the project site (Parcel H). Wastewater collected by ASCWD would be conveyed to the TTSA Truckee River Interceptor and then conveyed to the TTSA Water Reclamation Plant for treatment. Solid waste would be collected by Tahoe Truckee Sierra Disposal and sorted and disposed of at the Eastern Regional

3.4.5 Utilities and Services

The following agencies and private companies would provide public services and utilities for the proposed project:

- **Wastewater** Alpine Springs County Water District and Tahoe-Truckee Sanitation Agency
- **Water** Alpine Springs County Water District
- **Electricity** Liberty Energy
- **Telephone** AT&T
- **Cable** Comcast, Charter, Suddenlink
- **School District** Tahoe Truckee Unified School District
- **Fire Protection** North Tahoe Fire Protection District
- **Police Protection** Placer County Sheriff's Department
- **Solid Waste** Tahoe Truckee Sierra Disposal
- **Snow Removal** Placer County for Alpine Meadows Road; Alpine Sierra HOA (for on-site roadways)

3.5 ALTERNATIVE B DESCRIPTION

This Draft EIR includes evaluation of Alternative B, a lower-density design compared to Alternative A. These two alternatives are analyzed at an equal level of detail and either of these alternatives could be selected as the preferred project and approved by the Planning Commission. Under Alternative B, the project would construct 38 single-family residences and 5 secondary dwelling units (Figure 3-6, Alternative B Site Plan and Figure 3-7, Alternative B Tentative Subdivision Map), split into the West Side and East Side development pods. There would be approximately 18.93 acres of land designated as open space.

The West Side development pod would contain 10 single-family residences in a compact configuration accessed from Court B, which would be near the entrance to the proposed subdivision. These residences would be constructed in a common architectural style on lots ranging from 0.22 to 0.4 acres, with an average lot size of 0.29 acres. The East Side development pod would contain 28 single-family residential lots and up to 5 secondary dwelling units that could be constructed within those 28 lots (Figure 3-5). Lots would range from 0.4 acres to 1.0 acres, with an average lot size of 0.65 acres. Building setbacks would be standardized for a majority of the lots, and special setbacks (i.e., lot-specific building envelopes) would be individually established for several of the lots to protect site resources and to avoid grading and

Existing Conditions

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Views from Five Lakes Trail include scenic vistas that could be affected by Alternative A. Viewers using Five Lakes Trail are expected to have high sensitivity to changes in the viewshed, as these viewers are using a recreational facility that provides expansive views of an area primarily characterized by largely intact natural habitat. Existing views of the project site from the Five Lakes Trail are shown in Figure 5-4A; Figure 5-4B provides a visual simulation of these views with the addition of the proposed project.

Five Lakes Trail provides viewers with an expansive view of Bear Creek Valley. Bear Creek Valley, characterized by both natural and built features, rises sharply from the valley floor to high mountain peaks to the north, south, and west. Five Lakes Trail traverses the northern ridge of Bear Creek Valley, which separates Olympic Valley and Bear Creek Valley. The ridgelines to the north, south, and west form the boundaries of the visual environment from the lower and middle portions of Five Lakes Trail. The highest portion of Five Lakes Trail includes views of Five Lakes, Bear Creek Valley, and limited views to Lake Tahoe in the background.

Views from Five Lakes Trail are characterized by substantial topographical changes and a largely intact natural landscape. Views in the near foreground are made up of montane chaparral, conifer forest, and rock outcroppings. Midground views to the south and east include dense conifer forest from the valley floor to the ridgeline, with interspersed rock outcroppings. They also include the existing residential development in the valley, including Bear Creek Estates, Alpine Meadows Estates, the Stanford Alpine Chalet, and Alpine Meadows Ski Resort. The forested ridgelines contrast sharply against the sky, providing for a characteristic high-mountain vista.

The Alpine Meadows Ski Resort composes the most scenically apparent development within the viewshed of Five Lakes Trail. Areas that have been cleared for ski runs, chairlifts, and base development make up both the near foreground, foreground, and midground views from Five Lakes Trail. Existing residences, roadways, and powerlines are visible among the forested areas of the valley floor.

As discussed in Section 5.1, the project site is visible from Five Lakes Trail. For south-facing viewers along the lower and middle portions of the Five Lakes Trail, the project site is located within the approximate center of the midground views. The site composes the majority of the middleground views when observed from the portion of Five Lakes Trail roughly north and northeast of the intersection of Alpine Meadows Road and Bear Creek Drive. In these views, the site is characterized by a dense conifer forest across the majority of the site. Some rock outcroppings are also visible. Filtered views of some of the residences and roadways in the Bear

and site disturbance be minimized, and requiring that natural or earth tone materials and colors be used for the residential units to reduce the contrast with existing vegetation or soils.

With the implementation of the mitigation measures identified in this chapter, Alternative B would have a less than significant impact on scenic vistas.

Mitigation Measures

MM 5.1a: The project applicant shall implement MM 11.2c, which requires the applicant to prepare and submit Improvement Plans which must be approved by Placer County prior to recordation of each Final Subdivision Map.

MM 5.1b: Stockpiling of materials on site shall be minimized during construction. Construction staging areas and stockpile storage locations shall be identified on project Improvement Plans and shall be located within existing disturbed areas, as close to or within the areas of construction as possible, and as far as practical from existing dwellings and protected resources in the area. Material stockpiles shall be located to screen views of staging areas from Five Lakes Trail, Alpine Meadows Road, John Scott Trail, and Chalet Road to the extent feasible. A note stating this information shall be included on the Improvement Plans to the satisfaction of the Planning Services Division.

MM 5.1c: The ~~Implementation~~ Improvement Plans shall show that all grade cuts shall be revegetated and/or shall be stabilized with retaining walls constructed from natural or natural-appearing materials to the satisfaction of the Planning Services Division.

MM 5.1d: The Improvement Plans shall show that all guard rails and other roadway safety features shall be constructed using materials that mimic rusted steel to the satisfaction of the Planning Services Division.

MM 5.1e: The project applicant and all developers of individual lots shall implement the proposed Development Standards regarding setbacks, building envelopes, maximum lot coverage, grading and drainage improvements, and vegetation removal to ensure that site development minimizes alterations to existing topography and vegetation to the extent feasible.

Prior to recordation of each Final Subdivision Map, a reference manual (i.e., development notebook) shall be submitted for approval to the Planning Services Division which shall include plot plans for each lot in the project, depicting all dimensions, easements, setbacks, height limits, no access strips and other

Mitigation Measures

MM 5.3a: Prior to recordation of the first Final Map the project applicant shall modify the Development Standards to include the following Dark Sky Society recommendations:

- Full cutoff and fully shielded fixtures shall be used,
- Freestanding street lighting shall be limited to that necessary to meet roadway safety requirements
- Compact fluorescent (2300K), LED (3000K or less), or High Pressure Sodium is recommended unless the light is motion sensor activated, in which case incandescent or the instant start compact fluorescent bulbs can be used. Metal halide (due to its higher costs, energy use, impact on the environment, and greater contribution to "sky glow") is discouraged
- "Shut off" controls such as sensors, timers, motion detectors, shall be used. "Dusk-to-dawn" sensors without a middle-of-the-night shut off control shall be avoided.
- Fixtures shall be located no closer to the property line than four times the mounting height of the fixture, and shall not exceed the height of structures within 120 feet of the fixture.

These requirements shall be incorporated into the Development Notebook prepared for each project phase.

MM 5.3b: The project applicant shall implement MM 5.1d, which requires that all guard rails and other roadway safety features be constructed using materials that mimic rusted steel to the satisfaction of the Planning Services Division.

SOURCE: Dudek 2016

DUDEK

FIGURE 5-4a
Existing Conditions

SOURCE: Dudek 2016

DUDEK

FIGURE 5-4b
Visual Simulation of Alternative A

One special-status bird species, yellow warbler (*Dendroica petechia*), a California Department of Fish and Wildlife (CDFW) species of special concern, was observed in a large alder thicket near the center of the project site. Yellow warblers are generally found in riparian forest and shrubland, and, in the region, nesting records are close to water.

The Biological Survey Report indicates that it is likely that other special-status wildlife species could occasionally make use of the site, specifically Sierra marten (*Martes americana sierrae*), Sierra Nevada snowshoe hare (*Lepus americanus tahoensis*), and long-legged myotis (*Myotis volans*). However, given that there is existing development and constant human presence within 1,000 feet uphill and downhill of the site, it is unlikely that the site provides suitable denning/nesting habitat for Sierra marten and Sierra Nevada snowshoe hare, but it may provide occasional foraging habitat.

Long-legged myotis is one of the most geographically widespread bat species in western North America. The site does not provide suitable hibernacula (caves, deep rock crevices, and other such refuges with moderate temperature year round). However, maternity and/or day roosts might be present seasonally in dead trees or under exfoliating bark of large trees. At least one large tree with a hollow trunk is present within the site, and many trees that might have suitable exfoliating bark are present. The limited extent of surface water reduces the foraging value of the site somewhat (long-legged myotis prefers to forage over ponds).

The project site is located within the critical habitat extent for Sierra Nevada yellow legged frog (Rana sierrae) (CDFW 2015). Sierra Nevada yellow legged frog is listed under the FESA as threatened and is a candidate for listing under the CESA. ~~However, t~~The ~~proposed~~ Biological Survey Report prepared for the project (Appendix D), identified that the project site itself does not contain suitable habitat for the species, citing that there are no sources of stationary water. Adults of the species have not been observed to undertake significant migratory movements, and primarily maintain a home range of less than 30 feet (CWHR 2008). However, additional field review of the project site and comparison of the characteristics of the site and its water bodies to the published characteristics of SNYLF habitat was completed. This additional assessment verified that breeding habitat likely does not occur within the site, but that potentially suitable non-breeding aquatic habitat is present, and suitable breeding habitat occurs off site at a location that is seasonally contiguous with water bodies that extend through the project site. Thus, the proposed project would have the potential to result in direct impacts to SNYLF if a breeding population is present at an off-site location that is contiguous with on-site surface water during the summer (July and afterward)~~It is possible but unlikely that the species could occur incidentally on the site~~.

Therefore, these topics are not discussed further in this Draft EIR.

The analysis below evaluates potentially significant project impacts related to biological and forestry resources based on the following significance criteria:

- Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species?
- Would the project result in substantial habitat reduction affecting wildlife and plant populations?
- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community?
- Would the project have a substantial adverse effect on federally protected wetlands?
- Would the project interfere substantially with wildlife movement or native wildlife nursery sites?
- Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy?
- Would the project involve changes in the existing environment which, due to their location or nature, could result in the loss or conversion of forest land to non-agricultural or non-forest use?

6.3.2 Project Impacts

Impact 6.1

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special- status species?

Significance and Mitigation	Alternative A	Alternative B
Significance before mitigation:	Potentially significant	Potentially significant
Mitigation measures:	MM 6.1a ~~and~~ through MM 6.1c~~b~~	MM 6.1a ~~and~~ through MM 6.1c~~b~~
Significance after mitigation:	Less than significant	Less than significant

MM = Mitigation Measure.

Alternative A Impacts

The proposed project site lies in the Tahoe City quadrangle. A CNDDB query was performed for the nine quadrangles that center on the Tahoe City quadrangle. The list of species and natural communities that resulted is included in Appendix B to the Biological Survey Report (Appendix D of this EIR). Many of the special-status plants and wildlife identified through the CNDDB

query use wetland and aquatic habitats with slow-moving or stationary water, or, in the case of wetland species, are found in nearly level wetland habitats with long seasonal saturation to or nearly to the ground surface. These conditions are not found within the project site. Also, many of the plant species identified in the query are found only at higher or lower elevations, or are known only from occurrences west of the Sierra Nevada crest (occurrences in Wentworth Springs and/or Granite Chief quadrangle). Relatively few special-status species are known from habitats such as those that occur within the project site. For plant species, the field survey was floristic, so special-status species would have been detected regardless of CNDDB records or expected habitat associations.

One special-status species, yellow warbler (CDFW species of special concern) was observed in a large alder thicket near the center of the project site. It is reasonable to conclude that all other riparian thickets within the site that have sufficient width to provide visual cover would provide suitable foraging and nesting habitat for this bird. The single adult yellow warbler was observed in the largest patch of montane riparian habitat on the site. The species may make more than one nesting attempt during the season, so it cannot be determined whether the one observation in August constituted a nesting, single, or post-nesting individual that remained in the area prior to fall migration. Regardless, it is reasonable to conclude that the species nests within that patch of riparian habitat, and possibly in other sizeable patches elsewhere on the site. The very small proportion of riparian vegetation that would be lost as a result of the project is considered to be a **less-than-significant** impact on yellow warbler because sufficient riparian vegetation would remain on-site to support local populations of this species. Both the Development Standards (Appendix B) and the Alpine Sierra Forest Management and Fuel Reduction Plan (Appendix J) require that riparian vegetation be retained, thus impacts to riparian vegetation would be limited to the locations where roads cross the on-site streams. Project construction during the nesting season could result in disturbance and nest abandonment, which would be a **significant impact**. Mitigation Measure (MM) 6.1a would reduce this impact to **less than significant** by ensuring that no nesting yellow warblers are present in or immediately adjacent to habitat that will be disturbed during construction of Alternative A.

It is also likely that other special-status wildlife species could occasionally make use of the site, specifically Sierra marten, Sierra Nevada snowshoe hare, and long-legged myotis. Given that there is existing development and constant human presence within 1,000 feet uphill and downhill of the site, it is unlikely that the site provides suitable denning/nesting habitat for Sierra marten and Sierra Nevada snowshoe hare, but may provide occasional foraging habitat. Removal of this small area of marginal foraging habitat for the Sierra marten and Sierra Nevada snowshoe hare would constitute a **less than significant** impact.

Maternity roosts for the long-legged myotis (during May and June) and/or day roosts might be present seasonally in dead trees or under exfoliating bark of large trees. At least one large tree

with a hollow trunk is present within the site, and many trees of a size that might have suitable exfoliating bark are present. The limited extent of surface water reduces the foraging value of the site somewhat, as long-legged myotis prefers to forage over ponds. As long as a sufficient number of large and standing dead trees with cavities are preserved, as reflected in the Forest Management and Fuel Reduction Plan, potential use of the site by this species would be preserved, and the impact would be **less than significant**. However, removal of large, dead, or hollow trees that provide roosting sites during the maternity period could result in a **significant impact**. MM 6.1b would reduce this impact to **less than significant** by requiring limitations to construction periods and acoustic monitoring that would ensure that no trees providing potential roosts for long-legged myotis are disturbed during construction activities.

The project site is located within the critical habitat extent for Sierra Nevada yellow-legged frog (*Rana sierrae*) (CDFW 2015). Sierra Nevada yellow legged frog is listed under the FESA as threatened and is a candidate for listing under the CESA. The project site contains potentially suitable non-breeding aquatic habitat, and suitable breeding habitat occurs off site at a location that is seasonally contiguous with water bodies that extend through the project site. Thus, construction of the proposed project would have the potential to result in direct impacts to SNYLF if a breeding population is present at an off-site location that is contiguous with on-site surface water during the summer (July and afterward). Compared with some other California frog species, SNYLF are highly aquatic, typically not venturing further than 82 feet (25 meters) into dry upland coniferous forest habitat from the water body they inhabit. (SNYLF do venture further than this distance from water where mesic or fully wetland habitat exists, which is not the case on the present project site.)~~However, the proposed Biological Survey Report prepared for the project (Appendix D) identified that the project site itself does not contain suitable habitat for the species, citing that there are no sources of stationary water. Adults of the species have not been observed to undertake significant migratory movements, and primarily maintain a home range of less than 30 feet (CDFG 2008).~~ Because ~~the~~ there is ~~no~~ suitable breeding habitat that is seasonally contiguous with the on-site surface water and suitable non-breeding aquatic habitat within ~~for the species located on~~ the project site~~, and the CDFW's California Wildlife Habitat Relationship System states that individuals of the species are restricted to a very small home range~~, Alternative A ~~would~~ could result in ~~**less than**~~ **potentially significant** impacts to the species. MM 6.1c would reduce this impact to **less than significant** by requiring that a visual encounter survey (VES) for adult/metamorph SNYLF within all suitable aquatic habitats within the project site be completed prior to commencement of any construction activities onsite, that the VES survey be repeated each year during which construction would occur in areas where potential non-breeding habitat occurs, that daily biological monitoring be conducted in areas where SNLYF are detected, and that construction equipment be temporarily prohibited from entering areas within 100 feet of the non-breeding habitat when SNYLF are observed further than five feet from surface water.

Alternative B Impacts

As the area of disturbance onsite under Alternative B would be similar to the area of disturbance for Alternative A, the potential for impacts to special-status species would be similar. Alternative B would result in **less than significant** impacts to yellow warbler (outside of the nesting season), Sierra marten and Sierra Nevada snowshoe hare, and long-legged myotis (outside of nesting or roosting). Alternative B would include construction activities during the yellow warbler nesting season. This could result in disturbance and nest abandonment, which would be a **significant impact**. MM 6.1a would reduce this impact to **less than significant** by ensuring that no nesting yellow warblers are present in or immediately adjacent to habitat that will be disturbed by Alternative B. In addition, removal of large, dead, or hollow trees that provide roosting sites for long-legged myotis during the maternity period could result in a **significant** impact. MM 6.1b would reduce this impact to **less than significant** by requiring construction windows and acoustic monitoring that would ensure that no trees providing potential roosts for long-legged myotis are disturbed during construction activities. Alternative B could also result in a **potentially significant** impact to the SNYLF when construction occurs during the summer (July and afterward) and is within 82 feet of the potential non-breeding aquatic habitat onsite. MM 6.1c would reduce this impact to **less than significant** by requiring additional surveys, monitoring, and temporarily excluding construction equipment from areas where this species is observed.

Mitigation Measures

MM 6.1a: In the event that tree removal and/or operation of mechanized equipment of any kind is proposed to occur at any time between May 15 and August 15, surveys for nesting yellow warbler shall be conducted in any suitable nesting habitat (montane riparian thickets) that lies within 100 feet of all locations where equipment operation would occur. Surveys shall be conducted between 7 and 14 days prior to initiation of construction. If adult yellow warblers are detected during the survey (nest sites may not be identifiable), no equipment operation shall occur within 100 feet of the detection site until it is conclusively determined that no nest is present, or the nest is identified and young have fledged. This mitigation measure is not warranted for construction work starting after August 15, because this is after the latest date when nesting would be expected to be initiated.

MM 6.1b: To protect potential roosts of long-legged myotis, removal of any trees greater than 24 inches diameter at breast height, or of any standing dead trees with hollow centers (even if smaller than 24 inches diameter at breast height), shall be initiated either before May 1 or after July 15. Such tree removal may occur at any time of the year if

surveys using acoustical bat detectors demonstrate that no bats are roosting within any of the trees designated for removal. Conclusive evidence to this effect may be difficult to obtain, and the design, implementation, and interpretation of surveys shall be determined by a wildlife biologist with experience conducting acoustical bat surveys in coniferous forest in the Sierra Nevada.

MM 6.1c: To protect any individuals or populations of Sierra Nevada yellow-legged frogs (SNYLF), the project applicant shall undertake the following surveys, monitoring, and construction management practices:

a. Prior to the issuance of grading permits or improvement plans for construction of subdivision improvements, a U.S. Fish and Wildlife Service (Service)-approved biologist shall conduct a visual encounter survey (VES) for adult/metamorph SNYLF within all suitable aquatic habitats within the project site. The VES shall be conducted according to A Standardized Approach for Survey Aquatic Amphibians (Fellers and Freel 1995). Since breeding habitat does not exist within the site, the VES shall be conducted during the summer at a time where post-breeding adults and newly metamorphosed SNYLF are determined to be the most easily observed. The optimal dates for surveys may vary from year to year dependent on precipitation and snowpack; therefore dates of surveys will be approved in advance by the Service. At least two weeks prior to conducting this survey, the project proponent shall submit a Survey Plan to the Service for approval, which shall include the timing of the VES, where on the property the survey would be conducted, and the credentials of the biologist(s). The project proponent shall submit a report of the VES results to the County, Service, and California Department of Fish and Wildlife (CDFW). This initial survey will establish a baseline for the likely presence or absence of SNYLF may be conducted in any calendar year. If the initial VES is conducted in the same calendar year as project construction it will fulfill survey requirements of both parts a and b of this mitigation measure.

b. In the first calendar year subsequent to the initial VES, required in part A above, in which ground-disturbing construction activity will occur at any time between July 15 and the date that continuous surface flow in the unnamed seasonal creek has substantially ceased (over at least 50% of its length within the site), or if construction work that began before July 15 will continue into this period, a Service-approved biologist shall conduct a pre-construction VES as specified in part A of this mitigation measure. Results of the survey shall be reported to the County, Service, and CDFW a minimum of two weeks prior to

commencement or continuation of any construction activity after July 15. Within 100 feet of surface water, construction activity that began before July 15 would need to be discontinued for the year or suspended until the survey is completed, the report delivered, and two weeks allowed for agency review prior to recommencement of work within 100 feet of surface water.

c. In the event that no SNYLF are found in any surface water bodies within the site, no further mitigation is required, and no further survey or mitigation is required until the fourth year after the year of the negative survey results from a pre-construction survey.

d. In the event that SNYLF are detected within the site, a biological monitor with experience with SNYLF shall be present on site during any and all times that construction equipment would be operated within 100 feet of surface water in any water body on site, including Bear Creek and the unnamed seasonal creek, and shall examine all areas of possible equipment operation within 100 feet of surface water to ensure that no SNYLF are present. If SNYLF are observed further than 5 feet from the water, no equipment operation is permitted within 100 feet of the location of such observation on that day.

e. A biological monitor is not required for construction activity that occurs further than 100 feet from surface water or outside the period from July 15 through substantial cessation of flow in the unnamed seasonal creek, except within 100 feet of Bear Creek where, in the event that SNYLF are detected within the site, a biological monitor is required during any construction activities from July 15 (or the date of detection) through the onset of winter.

f. A biological monitor is not required for construction activity (e.g. construction of homes) that occurs further than 82 feet from surface water or outside the period from July 15 through substantial cessation of flow in the seasonal creek or within four years of a negative survey result. During construction on any of the following proposed Lots: 3, 4, 5, 6, 7, 8, 14, 15, 16, 25, 26, 27 and 28; if ground disturbing phases of home construction would occur within 82 feet of the unnamed seasonal stream after July 15, a biological monitor shall be required during any construction activities from July 15 (or the date of detection) through the onset of winter.

Impact 6.2

Would the project result in substantial habitat reductions affecting wildlife and plant populations?

Alternative B Impacts

As the area of disturbance on site under Alternative B would be similar to the area of disturbance for Alternative A and Alternative B would include the same drainage crossings as Alternative A, the potential for impacts to sensitive natural habitats would be similar. Alternative B would result in **less than significant** impacts to white fir forest, montane chaparral habitat, and rocky forb-subshrub habitat. As a result of the proposed drainage crossings, Alternative B would result in **potentially significant** impacts to riparian and riverine habitat. Implementation of MM 6.2a through MM 6.2c would ensure that such impacts are reduced to the extent feasible, and compensated for through habitat restoration.

Mitigation Measures

MM 6.2a: The Improvement Plans shall show that all bridges constructed for the proposed project shall be designed and built using a clear span technique that avoids permanent or temporary impacts to perennial or seasonal streams. Wherever feasible, bridges shall be designed so that no fill shall be placed, and no construction activities shall occur within the ordinary high water mark of a perennial or seasonal stream.

MM 6.2b: The project applicant shall submit a riparian habitat protection plan for review and approval by the Placer County Planning Services Division prior to approval of Improvement Plans for construction of bridges. The plan shall include architectural plans for each of the proposed bridge spans, shall detail any construction activities that may occur within the 50-foot seasonal or the 100-foot perennial riparian buffer, and specify best management practices (BMPs) that will be implemented to minimize impacts to riparian habitat. In the event that construction activities result in the removal or damage of any riparian habitat, the plan shall outline a restoration program to restore the riparian habitat at a 1:1 ratio in place or to create, restore, or conserve habitat of similar qualities and characteristics as the habitat lost to development through a compensatory program as approved by the Planning Services Division~~.~~ that provides for wetland mitigation in the Sierra Nevada and the Tahoe-Truckee regions and has been approved by the California Department of Fish and Wildlife. The compensatory mitigation for this project may include establishment of riparian vegetation, enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the riparian corridors.

displace the ephemeral drainages. It is possible that one or more sites where a project road crosses a tributary might entail placement of fill or excavation within a jurisdictional water of the United States, or within a water of the state. This would be a **significant impact**. MM 6.4a and MM 6.4b would reduce impacts to **less than significant** by requiring compensatory mitigation in the form of on-site or off-site restoration for any impacted waters of the United States.

Alternative B Impacts

Alternative B would include the same drainage crossings as Alternative A and would have the same potential as Alternative A to adversely affect waters of the United States. Alternative B would result in **potentially significant** impacts to federally protected wetlands. Implementation of MM 6.4a and MM 6.4b would ensure that this impact is reduced to **less than significant** by ensuring that compensation for the impact is provided through habitat restoration.

Mitigation Measures

MM 6.4a: Prior to Improvement Plan approval, the applicant shall furnish to the DRC evidence that the U.S. Army Corps of Engineers has been notified by certified letter regarding the existence of wetlands or~~,~~ streams~~, and/or vernal pools~~ on the property. Prior to Improvement Plan approval, if permits are required, they shall be obtained and copies submitted to DRC. Any clearing, grading, or excavation work shall not occur until the Improvement Plans have been approved.

MM 6.4b: Prior to Improvement Plan approval or recordation of the Final Subdivision Map(s) or issuance of a Building Permit, where off-site mitigation has been determined to be acceptable for compensation of wetland/riparian impacts the project applicant shall provide mitigation as follows:

A. Provide written evidence of payment that compensatory habitat has been established through the purchase of mitigation credits at a County-qualified wetland mitigation bank. Evidence of payment shall describe the amount and type of habitat purchased at the bank site. The amount of money required to purchase credits shall be equal to the amount necessary to replace wetland or riparian habitat acreage with habitat qualities and values that are comparable to the habitat lost due to development ~~. Evidence of payment shall describe the amount and type of habitat purchased at the bank site and resource values~~ including compensation for temporal loss. Evidence of payment, which describes the amount and type of habitat purchased at the bank site, must be provided to the County prior to issuance of Improvement Plan.

B. Construct and/or restore wetland and/or riparian habitat in an off-site location acceptable to Placer County and any state or federal resource agency with jurisdiction over the habitat, with the replacement habitat designed to achieve qualities and values that are comparable to the habitat lost due to development including compensation for temporal loss. A wetland/riparian mitigation plan shall be reviewed and approved by Placer County and any affected state or federal resource agency prior to initiation of construction of any compensatory habitat.

C. Provide a combination of mitigation bank credit purchase and off-site construction as outlined above.

Impact 6.5

Would the project interfere substantially with wildlife movement or native wildlife nursery sites?

Significance and Mitigation	Alternative A	Alternative B
Significance before mitigation:	Potentially significant	Potentially significant
Mitigation measures:	Mitigation Measures 6.5a and 6.5b	Mitigation Measures 6.5a and 6.5b
Significance after mitigation:	Less than significant	Less than significant

Alternative A Impacts

Alternative A would result in the construction of 47 residential units on approximately 47 acres. The regional setting of the study area is low-density residential development (single- and multi-family) with a major ski resort less than 1 mile away, all set in a late seral stage coniferous forest. The study area lies within approximately 1,000 feet of other existing residential development. Based on the project site's location within a developed, albeit low-density setting, it unlikely that Alternative A would result in significant impacts on any terrestrial migratory species or the local movement of any resident terrestrial species. As described under Impact 6.2, road construction could adversely affect a short stretch of Bear Creek, but impacts to Bear Creek would be less than significant after implementation of MM 6.2a, and would not substantially interfere with any potential aquatic migrations or local movements. Alternative A would result in the removal of trees and potential impacts to some riparian habitat that could support migratory bird species. Compliance with the Migratory Bird Treaty Act requires that project construction occur outside of the nesting season or that nesting bird surveys be completed prior to and during construction. Due to weather and climate, construction in the Sierra Nevada is restricted to a relatively narrow seasonal window that overlaps with the nesting season. Due to this factor, avoidance of the nesting season is not usually feasible. Construction during the nesting season of any resident or migratory bird species, or any construction that could interfere with the nests of raptor or owl species, would constitute a **significant impact.** MM 6.5a and MM 6.5b would

Mitigation Measure 6.7a, Alternative B would result in a **less-than-significant** impact on forestry resources.

Mitigation Measures

MM 6.7a: Prior to approval of Improvement Plans the applicant shall confer with the California Department of Forestry and Fire Protection (CalFire) to determine if a Timber Harvest Plan (THP) is required. If a THP is required the plan must be approved prior to ~~issuance~~ approval of Improvement Plans. Evidence of CalFire's written determination shall be provided to the Planning Services Division.

According to the *Geotechnical Engineering Report for Alpine Sierra Subdivision* prepared for the proposed project (Appendix H), the project site is generally underlain by 4 to 18 inches of silty sand, which is likely underlain by medium-dense to very-dense silty sand with gravel containing varying amounts of cobbles and boulders. Gravel soils, cobbles, and boulders suggest a limited ability of site soils to support groundwater recharge via percolation of surface water. Groundwater was not encountered in test pits excavated during the on-site investigation conducted for the geotechnical report.

12.1.4 Drainage

The project site is located within the Bear Creek Valley, a 3,600-acre sub-watershed that drains to the Truckee River. The Bear Creek sub-watershed drains the Alpine Meadows Ski Resort area, and flows northeast from its headwaters to the confluence with the Truckee River, approximately 3 miles downstream, north of the intersection of Alpine Meadows Road and State Route 89. Within the Bear Creek sub-watershed, the topography varies from nearly level to 100% slopes and natural streams with channel gradients ranging from 2% to 33%. The Bear Creek sub-watershed ranges in elevation from approximately 6,180 feet at Bear Creek and the Truckee River to 8,637 feet at Ward Peak in the southwest (TLA 2012).

Project Site Drainage

Bear Creek crosses the western portion of the project site while the eastern portion of the project site is traversed by natural drainage channels that are tributary to Bear Creek. Drainage runoff is conveyed from and through the project site via overland sheet flow and natural drainage channels. Slopes throughout the site range from approximately 10% to over 30%.

The *Preliminary Drainage Report* evaluates existing hydrologic conditions on the project site under 2-, 10-, and 100-year storm events under both summer and winter conditions. The report evaluated three locations that collect on-site drainage and four locations along Bear Creek prior to its confluence with the Truckee River, and the Supplement to the Preliminary Report evaluated design flows at nine points where runoff exits the project site. The *Preliminary Drainage Report* shows that winter runoff conditions result in the highest amount of runoff.

12.1.5 Floodplains

The project site is not located within the boundary of a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or Placer County. The project site is identified on ~~two~~ the FEMA flood insurance rate map ~~s: 06061C0200 F and 06061C0182 F~~panel number 0602390340 H. The boundaries of a delineated 100-year flood hazard ~~map~~ area do not extend to the project site (FEMA ~~1998a, 1998b~~2018). In addition, the project site does not appear to be located within the boundaries of a FEMA floodplain, as shown in the *Placer County Local*

Alternative A Impacts

The project site is not located within the boundary of a 100-year flood hazard area as mapped by FEMA or Placer County. The project site is included on ~~two~~ the FEMA flood insurance rate map panel 0602390340 H~~s: 06061C0200 F and 06061C0182 F~~. The boundaries of a delineated 100-year flood hazard ~~map~~ area do not extend to the project site (FEMA ~~1998a, 1998b~~2018). In addition, the project site does not appear to be located within the boundaries of a FEMA floodplain as identified in the Placer County Local Hazard Mitigation Plan (Placer County 2010). According to the Preliminary Drainage Report, FEMA is in the process of updating its map for this area, but it is not anticipated that Alternative A would be placed in a floodplain. A copy of the updated flood insurance rate map was obtained from FEMA, and the maps show the 100-year floodplain well downstream of the project site.

A 65-foot-long section of Bear Creek is located on the project site at the project site's frontage along Alpine Meadows Road. The east side of the project site contains a seasonal stream that runs generally north–south through the site. Alternative A would establish a 100-foot wide easement centered on the stream centerline. This area would be held in common by the homeowner's association~~.~~. Due to the topography of the stream channel, the local floodplain for this stream is contained within the stream channel. While the project does not propose placement of any residences within a local or FEMA-designated floodplain, the project would create four road crossings of the seasonal stream and one crossing of Bear Creek. These crossings and the proposed development throughout the site could modify the floodplains. Alternative A would have a **potentially significant** impact associated with the potential for housing to be located within those modified post-development floodplains. To ensure that no housing is located in the post-development floodplain, Mitigation Measure 12.4a requires that the post-development floodplains be indicated on the project Improvement Plans and Mitigation Measure 12.4b requires that the Improvement Plans show all finished house pad elevations to be a minimum of two feet above the 100-year floodplain line or finished floor elevations a minimum of three feet above the 100-year floodplain. Additionally, Mitigation Measure 12.4c requires that roadway bridges must span the 100 year-floodplain limits, and Mitigation Measure 12.4d prohibits grading within the 100-year floodplain other than as approved as part of the subdivision improvements.

With implementation of Mitigation Measures 12.4a through 12.4d, the project would result in **less-than-significant** impacts associated with constructing housing or other infrastructure within the 100-year floodplain**.**

Alternative B Impacts

While the Alternative B also does not propose placement of any residences within a local or FEMA-designated floodplain, this alternative would create four road crossings of the seasonal stream and one crossing of Bear Creek. These crossings and the proposed development throughout the site could modify the floodplains, resulting in a **potentially significant** impact associated with the potential for housing to be located within those modified post-development floodplains. To ensure that no housing is located in the post-development floodplain, Mitigation Measure 12.4a requires that the post-development floodplains be indicated on the project Improvement Plans and Mitigation Measure 12.4b requires that the Improvement Plans show all finished house pad elevations to be a minimum of two feet above the 100-year floodplain line or finished floor elevations a minimum of three feet above the 100-year floodplain. Additionally, Mitigation Measure 12.4c requires that roadway bridges must span the 100 year-floodplain limits, and Mitigation Measure 12.4d prohibits grading within the 100-year floodplain other than as approved as part of the subdivision improvements.

With implementation of Mitigation Measures 12.4a through 12.4d, Alternative B would result in **less-than-significant** impacts associated with constructing housing or other infrastructure within the 100-year floodplain**.**

Mitigation Measures

MM 12.4a: On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s), show the limits of the future, unmitigated, fully developed, 100-year flood plain (after grading) for Bear Creek and the un-named tributary on the east side of the project and designate same as a building setback line unless greater setbacks are required by other conditions contained herein.

MM 12.4b: On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s) show finished house pad elevations to be a minimum of two feet above the 100-year floodplain line (or finished floor -three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying ~~Department~~Division. This certification shall be done prior to construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by the Engineering and Surveying ~~Department~~ Division and approved by the floodplain manager. Benchmark elevation and location shall be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of Development Review Committee.

13.3.2 Impacts

Impact 13.1

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significance and Mitigation	Alternative A	Alternative B
Significance before mitigation:	Potentially significant	Potentially significant
Mitigation measures:	Mitigation Measures 13.1a ~~and~~ through 13.1d~~b~~	Mitigation Measures 13.1a ~~and~~ through 13.1d~~b~~
Significance after mitigation:	Less than significant	Less than significant

Alternative A Impacts

Existing residential development interspersed with fir and pine forests are located north and south of the proposed project site. Although Alternative A would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, the introduction of additional residential structures to the area under Alternative A could present an increased potential for wildland fires associated with human error, utilities, and automobiles, and the impact would be **potentially significant**.

Fuels Reduction

As discussed in Section 13.1, Environmental Setting, the tree canopy on the project site is characterized by a thick fir understory and a number of dead and dying trees. These features increase the risk of high-intensity fires on site. The addition of residents to the project site would increase both the likelihood of accidental fires and the damage such fires could cause to structures and human life. Mitigation Measure 13.1a requires the assessment of all trees that pose a risk to life and property by qualified personnel both prior to and after the completion of development. Implementation of Mitigation Measure 13.1a would ensure that individual trees posing a hazard to people within the project site would be maintained and/or removed to minimize the risk of wildfire.

In addition, Alternative A includes vegetation management activities, as described in the Alpine Sierra Forest Management and Fuel Reduction Plan provided in Appendix J. These activities are intended to ensure that fuel reduction activities implemented on site would reduce the risk that a high-intensity fire could occur on site and would contribute to restoration of a healthy forest ecosystem within the project site. As described in the Alpine Sierra Forest Management and Fuel Reduction Plan, fuels reduction activities on site would be focused on the following goals:

14.1.5 Wastewater

The ASCWD also provides wastewater collection service to the Alpine Meadows community and Alpine Meadows Ski Resort. ASCWD's sewer infrastructure was built incrementally along with specific development patterns in the community; however, no information is available on the length of mains, appurtenances, or other important infrastructure components. According to the Placer LAFCO Municipal Service Review for ASCWD, the maximum 7-day flow is estimated at 0.066 million gallons per day (mgd), with peak-hour flows of 0.28 mgd during the summer and 0.29 mgd during winter. The sewer infrastructure has adequate capacity to handle present flows (Placer LAFCO 2014).

The Tahoe–Truckee Sanitation Agency (TTSA) provides regional wastewater treatment service to several Tahoe-area communities through its five-member sewage collection districts, including the ASCWD. TTSA operates and maintains the Truckee River Interceptor and Water Reclamation Plant. The Truckee River Interceptor collects wastewater from the five member-districts and conveys the wastewater from Tahoe City to the ~~The TTSA advanced w~~Water ~~r~~Reclamation ~~p~~Plant ~~is~~ located in Martis Valley, east of Truckee (TTSA 2015). The Truckee River Interceptor is operated in accordance with TTSA's Sewer System Management Plan (TTSA 2017). The most recent expansion of the plant was completed in 2008. Currently, the plant has the capacity to treat 9.6 mgd ~~plant provides~~ using primary and secondary treatment, phosphorous removal, biological nitrogen removal, disinfection, and effluent filtration. Final effluent polishing is achieved through a soil aquifer treatment system. The TTSA Water Reclamation Plant ~~treatment plant~~ is required to meet some of the most stringent discharge requirements due to its location in the Lake Tahoe–Truckee region (TTSA 2015).

The Statewide General Waste Discharge Requirement applies to all public collection system agencies in California that own or operate collection systems that are composed of more than 1 mile of pipe or sewer lines and that convey untreated wastewater to a publicly owned treatment facility. It requires each agency to prepare a sewer system management plan. The TTSA Sewer System Management Plan was adopted in July 2009 and was last revised in ~~June 2014~~ 2017 (TTSA ~~2015~~2017).

14.1.6 Solid Waste

Weekly solid waste collection and removal service is provided by Tahoe Truckee Sierra Disposal (TTSD), which serves the Tahoe Basin and Truckee areas, including the project area. Solid waste is delivered to and processed at the Eastern Regional Landfill Material Recovery Facility (MRF) and Transfer Station on Cabin Creek Road just south of Truckee.

The MRF recovers, processes, and markets recyclable materials from the waste stream. The facility also processes source-separated wood waste and green waste, and accepts separated

Alternative A Impacts

Wastewater generated from Alternative A would be collected by the ASCWD, conveyed to the TTSA Truckee River Interceptor, and treated at the TTSA ~~wastewater treatment plant~~Water Reclamation Plant. The TTSA Water Reclamation Plant ~~wastewater treatment plant~~ is a permitted facility, and Alternative A would generate wastewater that is typical of a residential community. There would not be any unusual constituents in the wastewater that could cause the TTSA Water Reclamation Plant to exceed wastewater treatment requirements. While there is adequate capacity at this time within the Water Reclamation Plant to treat the volume of wastewater that would be generated under Alternative A, TTSA does not issue will serve letters and will only reserve capacity after approval of the formal application, payment of the TTSA sewer connection charges, and issuance of a TTSA Sewer Connection Permit.

As discussed in the technical memo (Appendix K, the Alpine Sierra Water and Sewer Facility Evaluation prepared by Stantec Consulting), adequate wastewater capacity exists in the existing ASCWD sewer system to serve Alternative A. However, because the project site is not currently connected to the sewer system, a new sewer connection would be required. Most of the homes would have direct access to gravity sewer lines, but a few would require individual sewage pumps to access the gravity sewer. One sewer lift station would be constructed in the northeastern corner of the project site (Parcel H), as shown in the Utility Plan on Figure 14-1. Alternative A would require construction of new on-site wastewater facilities to serve the project, which are evaluated as part of the project throughout this EIR. No other wastewater facilities would be required to accommodate Alternative A. This impact would be **less than significant** and no mitigation would be required.

Alternative B Impacts

As described above, wastewater would be collected by the ASCWD conveyed to the TTSA Truckee River Interceptor, and treated at the TTSA Water Reclamation Plant~~wastewater treatment plant~~. Since the TTSA plant is a permitted facility and has sufficient capacity to treat wastewater generated by the project, Alternative B would not cause the TTSA to exceed wastewater treatment requirements. As described above in regards to Alternative A, TTSA does not issue will serve letters. Rather, TTSA will only guarantee service after approval of the formal application, payment of TTSA sewer connection charges, and issuance of a TTSA Sewer Connection Permit.

Similar to Alternative A, wastewater generated by Alternative B would be accommodated in the existing ASCWD sewer system; however, a new sewer connection would be required and a sewer lift station would be constructed to feed into the existing ASCWD system. These on-site improvements are analyzed throughout this EIR, and no additional facilities would be required to

Specifically, the APCD has determined that a project that emits more than 55 pounds per day of ROG or NO_x, or 82 pounds per day of PM_{10} could have a cumulatively considerable contribution to air quality impacts, and that the project should mitigate for emissions above these thresholds.

As shown in Table 9-5, Alternative A: Unmitigated Construction Air Pollutant Emissions (see Chapter 9) and Table 9-6, Alternative B: Unmitigated Construction Air Pollutant Emissions, project construction under either alternative would result in emissions of NO_x greater than 55 pounds per day during the grading phases. Therefore, project construction would result in cumulatively considerable contribution to adverse air quality and the project's impacts would be **significant**. To ensure that these emissions are reduced to the extent feasible, Mitigation Measure 15.7a requires use of a construction equipment fleet during grading phases that achieves a 20% reduction in NO_x emissions compared to the statewide fleet average. This would reduce NO_x emissions during grading phases of construction to less than 55 pounds per day and reduce the project's contribution to the cumulative impact to a **less-than-significant** level.

As shown in Table 9-7, Alternative A: Unmitigated Long-Term Air Pollutant Emissions, and Table 9-8, Alternative B: Unmitigated Long-Term Air Pollutant Emissions, emissions of ROG, NO_x and PM_{10} that remain below the APCD Cumulative thresholds. These emissions would not make a cumulatively considerable contribution to the significant cumulative impact and the project would have a **less than significant** impact in the cumulative scenario.

Mitigation Measures

MM 15.7a: Prior to ~~issuance of Grading permits~~approval of Improvement Plans, the applicant shall provide a written calculation to the Placer County Air Pollution Control District (APCD) for approval demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used during the grading phases of the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20% oxides of nitrogen (NO_x) reduction as compared to the California Air Resources Board statewide fleet average emissions. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The Construction Mitigation Calculator available at the following link shall be used to calculate compliance with this condition: http://www.airquality.org/ceqa/mitigation.shtml. The completed calculator worksheet shall be submitted to the Placer County APCD prior to the start of construction.

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CHAPTER 4
MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines Section 15097 requires that whenever a public agency approves a project based on a Mitigated Negative Declaration or an Environmental Impact Report (EIR), the public agency shall establish a mitigation monitoring and reporting program to ensure that all adopted mitigation measures are implemented.

This mitigation monitoring and reporting program (MMRP) is intended to satisfy this requirement of the CEQA Guidelines as it relates to the Alpine Sierra Subdivision (proposed project). This MMRP will be used by Placer County staff to ensure compliance with all mitigation measures identified in the Alpine Sierra Subdivision EIR is achieved during project implementation and operation. The MMRP provides for monitoring of construction activities, as necessary, and in the field identification and resolution of environmental concerns.

4.2 STANDARD MITIGATION MONITORING PROGRAM

Placer County has adopted a standard mitigation monitoring program (Placer County Code Section 18.28.030). This program requires that mitigation measures adopted for projects requiring discretionary County approvals, such as the Alpine Sierra Subdivision project, be included in the conditions of approval for those projects and that issuance of any of the permits or county actions listed below must be preceded by a verification by county staff that certain conditions of approval/mitigation measures have been met. Compliance with conditions of approval is monitored by the County through a variety of permit and review processes, including:

- Development Review Committee approval
- Improvement Plans approval (this approval must be obtained prior to issuance of grading or building permits)
- Grading Permit issuance
- Improvements construction inspection
- Final map recordation
- Acceptance of subdivision improvements as complete
- Building permit issuance
- Certificates of Occupancy

The mitigation measures for the Alpine Sierra Subdivision project included in the EIR would be monitored through the County's Standard Mitigation Monitoring Program, as indicated in the

text of each mitigation measure. The following table provides the full text of each mitigation measure and identifies the specific permit(s) or approval(s) from the Standard Mitigation Monitoring Program that the County would use to verify compliance with each, or another monitoring mechanism that would be used if the mitigation measure cannot be verified through the County's Standard Mitigation Monitoring Program.

Mitigation Monitoring Program Description

Placer County will coordinate monitoring activities and document the implementation of mitigation measures for each project phase. Table 1 lists each mitigation measure as identified in the Final EIR and the associated implementation, monitoring/reporting, timing and performance requirements. The table includes:

1. the full text of each applicable mitigation measure;
2. the party or parties responsible for implementation and monitoring of each measure and any reporting requirements;
3. the timing of implementation of each mitigation measure, including any ongoing monitoring and/or reporting requirements; and
4. performance criteria by which to ensure mitigation requirements have been met.

Following completion of the monitoring and reporting process, the final monitoring results, as well as annual reports where required, will be recorded and incorporated into the project file maintained by Placer County.

4.3 ALPINE SIERRA SUBDIVISION MITIGATION MONITORING AND REPORTING PROGRAM

No mitigation measures are required for the following resources:

- Agriculture and Forestry Resources
- Air Quality
- Greenhouse Gases
- Mineral Resources

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Land Use and Planning				
Mitigation Measure 4.1a: Prior to recordation of each Final Map the project shall prepare and receive approval of an employee housing plan in compliance with Placer County General Plan Policy C-2. The plan shall outline the methodology for compliance with Policy C-2 through demonstration that employee housing will be provided by 1) Construction of on-site employee housing; 2) Construction of off-site employee housing; 3) Dedication of land for needed units; 4) Payment of an in-lieu fee, or any combination thereof. Each housing plan shall demonstrate that housing would be provided for 50% of the FTEE generated by the development phase, based on the employee generation rate of 0.33 FTEE per residential lot. Any employee units constructed by the project or dedicated by the project shall be deed restricted as Workforce Housing. No Final Map shall be recorded prior to completion of the employee housing plan. This Vesting Tentative Map may be constructed in phases. Any whole or fractional employee units provided for in initial phases may be credited toward employees generated by a future phase to the extent that a prior phase provided more units than were generated by such phase. The project shall receive credit for construction of the caretaker residence concurrent with the phase during which the unit is constructed. Credit shall be given at a rate of one FTEE per residential bedroom plus one additional employee (e.g. a two-bedroom unit would provide workforce housing for three employees).	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Employee housing plan approved and implemented prior to recordation of each Final Map	• Employee housing plan provides housing for 50% of the fulltime equivalent employees generated by the development (Placer County General Plan Policy C-2) • Construction of employee housing, dedication of land, and/or in-lieu fee paid

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Visual Resources				
Mitigation Measure 5.1a: The project applicant shall implement Mitigation Measure 11.2c, which requires the applicant to prepare and submit Improvement Plans which must be approved by Placer County prior to recordation of each Final Subdivision Map.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Improvement Plans demonstrate implementation of applicable mitigation measures, conditions of approval, and Placer County's Land Development Manual
Mitigation Measure 5.1b: Stockpiling of materials on site shall be minimized during construction. Construction staging areas and stockpile storage locations shall be identified on project Improvement Plans and shall be located within existing disturbed areas, as close to or within the areas of construction as possible, and as far as practical from existing dwellings and protected resources in the area. Material stockpiles shall be located to screen views of staging areas from Five Lakes Trail, Alpine Meadows Road, John Scott Trail, and Chalet Road to the extent feasible. A note stating this information shall be included on the Improvement Plans to the satisfaction of the Planning Services Division.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Improvement Plans identify stockpiling and storage areas; • Stockpiling and storage areas are screened from neighboring roads and the Five Lakes Trail
Mitigation Measure 5.1c: The Improvement Plans shall show that all grade cuts shall be revegetated and/or shall be stabilized with retaining walls constructed from natural or natural-appearing materials to the satisfaction of the Planning Services Division.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Improvement Plans identify revegetation areas; • Improvement Plans identify materials to be used in construction of retaining walls
Mitigation Measure 5.1d: The Improvement Plans shall show that all guard rails and other roadway safety features shall be constructed using materials that mimic rusted steel to the satisfaction of the Planning Services Division.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Improvement Plans identify materials and finishes for guard rails and other roadway safety features
Mitigation Measure 5.1e: The project applicant and all developers of individual lots shall implement the proposed Development Standards regarding setbacks, building envelopes, maximum lot coverage, grading	Project applicant; developers of individual lots	Placer County Community Development	• Development notebook submitted for approval prior to	• Development notebook documents all development standards

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
and drainage improvements, and vegetation removal to ensure that site development minimizes alterations to existing topography and vegetation to the extent feasible. Prior to recordation of each Final Subdivision Map, a reference manual (i.e., development notebook) shall be submitted for approval to the Planning Services Division which shall include plot plans for each lot in the project, depicting all dimensions, easements, setbacks, height limits, no access strips and other restrictions which might affect the construction of structures on said lot and the permitted lot coverage per Placer County Zoning Ordinance Section 17.54.100.A.2.e. No Building Permits may be issued for the project until this manual is provided to and accepted by the Development Review Committee for format and content requirements.		Resource Agency; Planning Services Division; and Placer County Development Review Committee	recordation of each Final Map • Development notebook approved prior to the first Building Permit within the project • Building plans for individual lots determined consistent with the development notebook prior to issuance of building permits	from the Architecture Handbook, applicable mitigation measures, conditions of approval, and Placer County's Land Development Manual • Building plans for individual lots are consistent with the development notebook
Mitigation Measure 5.2a: The project applicant shall implement Mitigation Measures 5.1a through MM 5.1e. These measures regulate locations of construction material staging areas, content and approval requirements for Improvement Plans, treatment of grade cuts, and material selections for guard rails and other roadway safety features to the satisfaction of the Planning Services Division, and require that all future development on the site comply with the proposed Development Standards.	Project applicant; developers of individual lots	Placer County Community Development Resource Agency; Planning Services Division	• As identified for Mitigation Measures 5.1a through 5.1e above	• As identified for Mitigation Measures 5.1a through 5.1e above
Mitigation Measure 5.3a: Prior to recordation of the first Final Map the project applicant shall modify the Architecture Handbook to include the following Dark Sky Society recommendations: • Full cutoff and fully shielded fixtures shall be used, • Freestanding street lighting shall be limited to that necessary to meet roadway safety requirements • Compact fluorescent (2300K), LED (3000K or less), or High Pressure Sodium is recommended unless the light is motion sensor activated, in which case incandescent or the instant start compact fluorescent bulbs can be used. Metal halide (due to its higher costs, energy use, impact on the environment, and	Project applicant	Placer County Community Development Resource Agency; Planning Services Division	• Prior to recordation of the first Final Map	• Development Standards and Development Notebook require site lighting to meet Dark Sky Society recommendations

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
greater contribution to "sky glow") is discouraged • "Shut off" controls such as sensors, timers, motion detectors, shall be used. "Dusk-to-dawn" sensors without a middle-of-the-night shut off control shall be avoided. • Fixtures shall be located no closer to the property line than four times the mounting height of the fixture, and shall not exceed the height of structures within 120 feet of the fixture. These requirements shall be incorporated into the Development Notebook prepared for each project phase.				
Mitigation Measure 5.3b: The project applicant shall implement Mitigation Measure 5.1d, which requires that all guard rails and other roadway safety features be constructed using materials that mimic rusted steel to the satisfaction of the Planning Services Division.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• As identified for Mitigation Measure 5.1d above	• As identified for Mitigation Measure 5.1d above
Biological Resources				
Mitigation Measure 6.1a: In the event that tree removal and/or operation of mechanized equipment of any kind is proposed to occur at any time between May 15 and August 15, surveys for nesting yellow warbler shall be conducted in any suitable nesting habitat (montane riparian thickets) that lies within 100 feet of all locations where equipment operation would occur. Surveys shall be conducted between 7 and 14 days prior to initiation of construction. If adult yellow warblers are detected during the survey (nest sites may not be identifiable), no equipment operation shall occur within 100 feet of the detection site until it is conclusively determined that no nest is present, or the nest is identified and young have fledged. This mitigation measure is not warranted for construction work starting after August 15, because this is after the latest date when nesting would be expected to be initiated.	Project applicant; developers of individual lots; and construction contractors	Placer County Community Development Resource Agency, Planning Services Division	• Surveys completed between 7 and 14 days prior to initiation of construction if such initiation would occur between May 15 and August 15	• Surveys are completed • Construction is excluded from areas within 100 feet of observed yellow warblers until young have fledged or it is conclusively determined that no nest is present
Mitigation Measure 6.1b: To protect potential roosts of long-legged myotis, removal of any trees greater than 24 inches diameter at breast height, or of any standing dead trees with hollow centers (even if smaller than 24 inches diameter at breast height), shall be initiated either before May 1 or after July 15. Such tree removal may occur at any time of the year if surveys using acoustical bat detectors demonstrate that no bats are	Project applicant; developers of individual lots; and construction contractors	Placer County Community Development Resource Agency, Planning Services Division	• During site preparation, grading, and construction	• Removal of trees greater than 24 inches diameter at breast height and any standing dead trees with hollow centers is completed

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
roosting within any of the trees designated for removal. Conclusive evidence to this effect may be difficult to obtain, and the design, implementation, and interpretation of surveys shall be determined by a wildlife biologist with experience conducting acoustical bat surveys in coniferous forest in the Sierra Nevada.				before May 1 or after July 15 unless it is conclusively determined that no bats are roosting in trees proposed to be removed
Mitigation Measure 6.1c: To protect any individuals or populations of Sierra Nevada yellow-legged frogs (SNYLF), the project applicant shall undertake the following surveys, monitoring, and construction management practices: A. Prior to the issuance of grading permits or improvement plans for construction of subdivision improvements, a U.S. Fish and Wildlife Service (Service)-approved biologist shall conduct a visual encounter survey (VES) for adult/metamorph SNYLF within all suitable aquatic habitats within the project site. The VES shall be conducted according to A Standardized Approach for Survey Aquatic Amphibians (Fellers and Freel 1995). Since breeding habitat does not exist within the site, the VES shall be conducted during the summer at a time where post-breeding adults and newly metamorphosed SNYLF are determined to be the most easily observed. The optimal dates for surveys may vary from year to year dependent on precipitation and snowpack; therefore dates of surveys will be approved in advance by the Service. At least two weeks prior to conducting this survey, the project proponent shall submit a Survey Plan to the Service for approval, which shall include the timing of the VES, where on the property the survey would be conducted, and the credentials of the biologist(s). The project proponent shall submit a report of the VES results to the County, Service, and California Department of Fish and Wildlife (CDFW). This initial survey will establish a baseline for the likely presence or absence of SNYLF may be conducted in any calendar year. If the initial VES is conducted in the same calendar year as project construction it will fulfill survey requirements of both parts a and b of this mitigation measure.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• During site preparation, grading, and construction within 100 feet of surface water that occurs between July 15 and the date that continuous surface flow in the unnamed seasonal creek has substantially ceased	• VES is completed during summer and at a time that is approved in advance by the Service for each year in which construction would occur within 100 feet of surface water. • VES is repeated for each year in which construction will occur within 100 feet of surface water except where negative results were obtained in a VES completed within the prior four years • Biological monitor is present when construction occurs within 100 feet of surface water • No equipment is permitted to operate within 100 feet of surface water on any day that SNYLF are observed further than 5

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
B. In the first calendar year subsequent to the initial VES, required in part A above, in which ground-disturbing construction activity will occur at any time between July 15 and the date that continuous surface flow in the unnamed seasonal creek has substantially ceased (over at least 50% of its length within the site), or if construction work that began before July 15 will continue into this period, a Service-approved biologist shall conduct a pre-construction VES as specified in part A of this mitigation measure. Results of the survey shall be reported to the County, Service, and CDFW a minimum of two weeks prior to commencement or continuation of any construction activity after July 15. Within 100 feet of surface water, construction activity that began before July 15 would need to be discontinued for the year or suspended until the survey is completed, the report delivered, and two weeks allowed for agency review prior to recommencement of work within 100 feet of surface water. C. In the event that no SNYLF are found in any surface water bodies within the site, no further mitigation is required, and no further survey or mitigation is required until the fourth year after the year of the negative survey results from a pre-construction survey. D. In the event that SNYLF are detected within the site, a biological monitor with experience with SNYLF shall be present on site during any and all times that construction equipment would be operated within 100 feet of surface water in any water body on site, including Bear Creek and the unnamed seasonal creek, and shall examine all areas of possible equipment operation within 100 feet of surface water to ensure that no SNYLF are present. If SNYLF are observed further than 5 feet from the water, no equipment operation is permitted within 100 feet of the location of such observation on that day. E. A biological monitor is not required for construction activity that occurs further than 100 feet from surface water or outside the period from July 15 through substantial cessation of flow in the unnamed seasonal creek, except within 100 feet of Bear Creek where, in the event that SNYLF are detected within the site, a				feet from the water • A biological monitor is present between July 15 (or the date of detection of SNYLF) through the onset of winter during any ground disturbing activities within 82 feet of surface water on any of the following lots: 3, 4, 5, 6, 7, 8, 14, 15, 16, 25, 26, 27 and 28

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
biological monitor is required during any construction activities from July 15 (or the date of detection) through the onset of winter. F. A biological monitor is not required for construction activity (e.g. construction of homes) that occurs further than 82 feet from surface water or outside the period from July 15 through substantial cessation of flow in the seasonal creek or within four years of a negative survey result. During construction on any of the following proposed Lots: 3, 4, 5, 6, 7, 8, 14, 15, 16, 25, 26, 27 and 28; if ground disturbing phases of home construction would occur within 82 feet of the unnamed seasonal stream after July 15, a biological monitor shall be required during any construction activities from July 15 (or the date of detection) through the onset of winter.				
Mitigation Measure 6.2a: The Improvement Plans shall show that all bridges constructed for the proposed project shall be designed and built using a clear span technique that avoids permanent or temporary impacts to perennial or seasonal streams. Wherever feasible, bridges shall be designed so that no fill shall be placed, and no construction activities shall occur within the ordinary high water mark of a perennial or seasonal stream.	Project applicant	Placer County Community Development Resource Agency and Placer County Planning Services Division	• Prior to Improvement Plan approval	• Bridges are shown on Improvement Plans to be constructed with a clear span technique • If placement of fill and/or construction activities are shown to occur within the ordinary high water mark, project engineers shall provide evidence of the infeasibility of avoidance
Mitigation Measure 6.2b: The project applicant shall submit a riparian habitat protection plan for review and approval by the Placer County Planning Services Division prior to approval of Improvement Plans for construction of bridges. The plan shall include architectural plans for each of the proposed bridge spans, shall detail any construction activities that may occur within the 50-foot seasonal or the 100-foot perennial riparian buffer, and specify best management practices (BMPs) that will be implemented to minimize impacts to riparian habitat. In the event that construction activities result in the removal or damage of any riparian	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Riparian habitat protection plan shall be approved prior to Improvement Plan approval • If any habitat loss would occur and in-	• Architectural and construction details of bridges are identified, including specific information regarding any construction within mandated riparian buffers (50 feet for

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
habitat, the plan shall outline a restoration program to restore the riparian habitat at a 1:1 ratio in place or through a compensatory program as approved by the Planning Services Division.			place habitat restoration is proposed, the restoration plans must be included in the Improvement Plans and implemented prior to the County's acceptance of subdivision improvements as complete • If any habitat loss would occur and restoration through a compensatory program is proposed, evidence of payment into the compensatory program must be provided prior to the County's acceptance of subdivision improvements as complete	seasonal streams and 100 feet for perennial streams) • BMPs to minimize impacts to riparian habitat are identified • Where any habitat loss would occur, restoration is completed at a minimum 1:1 ratio
Mitigation Measure 6.2c: The project applicant shall comply with the California Department of Fish and Wildlife's Lake and Streambed Alteration Program (California Fish and Game Code Sections 1600–1616), including notification, submission of all required plans and documents, and payment of required fees to the California Department of Fish and Wildlife (CDFW) to confirm that bridge construction activities do not result in substantial effects related to the obstruction, diversion, or introduction of debris into any river or stream.	Project applicant	CDFW and Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• CDFW is notified of any construction that could affect the bed or bank of a stream • A Streambed Alteration Agreement is established and implemented for any

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Prior to approval of Improvement Plans for any portion of the project that would construct improvements that could affect the bed or bank of a stream, the applicant shall furnish to the Development Review Committee (DRC) evidence that the CDFW has been notified. If permits are required, they shall be obtained and copies submitted to DRC prior to issuance of Improvement Plans.				construction that could affect the bed or bank of a stream such that construction does not result in obstruction, diversion, or introduction of debris into any river or stream
Mitigation Measure 6.3a: The project applicant shall implement Mitigation Measure 6.2a to ensure that bridge design avoids permanent or temporary impacts to perennial or seasonal streams.	Project applicant	Placer County Community Development Resource Agency; Planning Services Division	• As identified for Mitigation Measure 6.2a above	• As identified for Mitigation Measure 6.2a above
Mitigation Measure 6.3b: The project applicant shall implement Mitigation Measure 6.2b, which requires submittal of a riparian habitat protection plan and restoration program prior to approval of Improvement Plans.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• As identified for Mitigation Measure 6.2b above	• As identified for Mitigation Measure 6.2b above
Mitigation Measure 6.3c: The project applicant shall implement Mitigation Measure 6.2c, which requires compliance with the CDFW Lake and Streambed Alteration Program to ensure that bridge construction activities do not result in substantial effects related to the obstruction, diversion, or introduction of debris into any river or stream.	Project applicant	CDFW and Placer County Community Development Resource Agency, Planning Services Division	• As identified for Mitigation Measure 6.2c above	• As identified for Mitigation Measure 6.2c above
Mitigation Measure 6.4a: Prior to Improvement Plan approval, the applicant shall furnish to the DRC evidence that the U.S. Army Corps of Engineers has been notified by certified letter regarding the existence of wetlands or streams on the property. Prior to Improvement Plan approval, if permits are required, they shall be obtained and copies submitted to DRC. Any clearing, grading, or excavation work shall not occur until the Improvement Plans have been approved.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division and U.S. Army Corps of Engineers	• Prior to Improvement Plan approval	• U.S. Army Corps of Engineers is notified of any construction that could affect wetlands or streams • A Clean Water Act Section 404 permit is obtained or a pre-construction notification

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
				regarding use of a Nationwide Permit is submitted to the U.S. Army Corps of Engineers • The applicant shall provide evidence of compliance with mitigation requirements specified in the Section 404 permit, as approved by the Corps.
Mitigation Measure 6.4b: Prior to Improvement Plan approval or recordation of the Final Subdivision Map(s) or issuance of a Building Permit, where off-site mitigation has been determined to be acceptable for compensation of wetland/riparian impacts the project applicant shall provide mitigation as follows: A. Provide written evidence of payment that compensatory habitat has been established through the purchase of mitigation credits at a County-qualified wetland mitigation bank. Evidence of payment shall describe the amount and type of habitat purchased at the bank site. The amount of money required to purchase credits shall be equal to the amount necessary to replace wetland or riparian habitat acreage. Evidence of payment shall describe the amount and type of habitat purchased at the bank site and resource values including compensation for temporal loss. Evidence of payment, which describes the amount and type of habitat purchased at the bank site, must be provided to the County prior to issuance of Improvement Plan. B. Construct wetland and/or riparian habitat in an off-site location acceptable to Placer County and any state or federal resource agency with jurisdiction over the habitat. A wetland/riparian mitigation plan shall be reviewed and approved by Placer County and any affected state or federal resource agency prior to initiation of construction of any compensatory habitat.	Project applicant, developers of individual lots, and construction contractors	Placer County Community Development Resource Agency; Planning Services Division, U.S. Army Corps of Engineers, CDFW, Lahontan Regional Water Quality Control Board	• Prior to Improvement Plan approval, recordation of each Final Map, and/or issuance of a building permit, where such approvals, maps, or permits involve actions that would result in removal of wetlands and/or riparian habitat	• Compensatory habitat is established through an approved wetland mitigation bank and/or is constructed pursuant to County and resource agency approvals

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
C. Provide a combination of mitigation bank credit purchase and off-site construction as outlined above.				
Mitigation Measure 6.5a: The Improvement Plans shall include the following note requiring a nesting bird survey and shall show placement of all protective fencing for those trees identified for protection within the survey: Prior to any grading or tree removal activities, a focused survey for nesting birds shall be conducted by a qualified biologist during the nesting season (March 1–September 1). A report summarizing the survey shall be provided to Placer County and the California Department of Fish and Wildlife (CDFW) within 30 days of the completed survey. If an active nest is identified, appropriate mitigation measures shall be developed and implemented in consultation with CDFW. If construction is proposed to take place between March 1 and September 1, no construction activity or tree removal shall occur within 500 feet of an active nest (or greater distance, as determined by the CDFW). Construction activities may only resume after a follow up survey has been conducted and a report prepared by a qualified biologist indicating that the nest (or nests) are no longer active, and that no new nests have been identified. A follow-up survey shall be conducted 2 months following the initial survey, if the initial survey occurs between March 1 and July 1. Additional follow up surveys may be required by the DRC, based on the recommendations in the raptor study and/or as recommended by the CDFW. Temporary construction fencing and signage as described herein shall be installed at a minimum 500-foot radius around trees containing active raptor nests and a minimum 100-foot radius around trees containing migratory bird nests. Nesting bird surveys shall occur between 7 and 14 days prior to initiation of construction. Nesting surveys shall be conducted between dawn and 11:00 a.m. Survey work shall cover all habitat within 100 feet of vegetation removal or ground disturbance, or 500 feet from the limit of disturbance in the case of raptor/owl surveys. In the event that nests are identified, temporary non-disturbance zones shall be the same width as the survey buffer (100 to 500 feet, depending on the species found to be nesting), and a revisit by the biologist, with confirmed observations of fledglings in the nest vicinity, shall be required prior to vegetation removal or soil disturbance, unless this were to be delayed until after August 15.	Project applicant	Placer County Community Development Resource Agency; Planning Services Division; CDFW	• Notes must be on Improvement Plans prior to Improvement Plan approval • Nesting survey must be completed between 7 and 14 days prior to initiation of construction when construction would begin between March 1 and September 1 and report provided to CDFW within 30 days. • Survey must be repeated in 2 months if the initial survey occurs between March 1 and July 1. • When active nests are identified, temporary construction fencing and signage must be installed prior to issuance of grading or building permits.	• Nesting surveys are completed within the identified timeframes • No-construction buffer zones are established and maintained

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
***Mitigation Measure 6.5b*:** Prior to approval of Improvement Plans for any portion of the project that would remove trees or vegetation, the applicant shall furnish to the DRC a Vegetation Management Plan prepared by a Registered Professional Forester that evaluates tree/vegetation removal, identifies trees with disturbance to their critical root zone, addresses fuel load and fire hazard reduction, and specifies tree planting designed to enhance wildlife habitat, aesthetic quality, and forest health. The applicant shall provide to the DRC an implementation plan that demonstrates compliance with recommendations of the Vegetation Management Plan.	Project applicant	Placer County Community Development Resource Agency; Planning Services Division	• Prior to Improvement Plan approval	• A Vegetation Management Plan is prepared and implemented that identifies trees that would be subject to disturbance within their critical root zone and identifies tree planting that would enhance wildlife habitat, aesthetic quality, and forest health
Mitigation Measure 6.6a: The project applicant shall implement Mitigation Measure 6.5b, which requires that the applicant furnish to the DRC a Vegetation Management Plan documenting tree protection measures to be implemented on site prior to approval of Improvement Plans.	Project applicant	Placer County Community Development Resource Agency; Planning Services Division	• As identified for Mitigation Measure 6.5b above	• As identified for Mitigation Measure 6.5b above
Mitigation Measure 6.6b: The project applicant shall implement Mitigation Measure 6.5a, which requires that the applicant obtain appropriate permits for impacts to wetlands and riparian vegetation from the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife prior to approval of Improvement Plans.	Project applicant, developers of individual lots	Placer County Community Development Resource Agency; Planning Services Division; and CDFW	• As identified for Mitigation Measure 6.5a above	• As identified for Mitigation Measure 6.5a above
Mitigation Measure 6.7a: Prior to approval of Improvement Plans the applicant shall confer with the California Department of Forestry and Fire Protection (CalFire) to determine if a Timber Harvest Plan (THP) is required. If a THP is required the plan must be approved prior to approval of Improvement Plans. Evidence of CalFire's written determination shall be provided to the Planning Services Division.	Project applicant	CalFire Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• CalFire determines whether a THP is needed. If so, a THP is approved prior to Improvement Plan approval

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Transportation and Circulation				
Mitigation Measure 7.3a: The Improvement Plans shall show that the trees along the east side of Alpine Meadows Road, south of the Alternative A and B access encroachment, shall either be removed or trimmed to provide a minimum of 440 feet of corner sight distance from the project's access driveway. Final landscaping plans shall ensure that driver sight distance looking to the north and to the south along Alpine Meadows Road from the site access encroachment is not hindered. The homeowners' association (HOA) shall include in its Covenants, Conditions, and Restrictions (CC&Rs) a requirement that the HOA is responsible for routinely trimming the trees along the east side of Alpine Meadows Road south of the project access encroachment and for removing snow from the corners of the Alpine Meadows Road/site access driveway intersection to provide adequate sight distance for drivers exiting the site and judging gaps in oncoming traffic along Alpine Meadows Road. Snow removed shall be deposited at a location that is not on adjacent private properties or within the public right-of-way.	Project applicant, HOA	Placer County Community Development Resource Agency; Engineering and Surveying Division; and Placer County Department of Public Works and Facilities	• Prior to Improvement Plan approval (tree removal, tree trimming, and landscaping) • Prior to approval of CC&Rs • Maintenance of sight distance by routine tree trimming and snow removal required in perpetuity • Compliance with performance standards must be achieved throughout the life of the project, which may be verified by County site inspections	• Improvement Plans demonstrate that adequate sight distance will be provided • CC&Rs require HOA to conduct routine vegetation pruning/management and snow removal to ensure adequate sight distance is maintained
Mitigation Measure 7.4a: The project applicant shall implement Mitigation Measure 14.1a. This Mitigation Measure requires the applicant to obtain a will-serve letter from the North Tahoe Fire Protection District and to purchase and donate to the North Tahoe Fire Protection District a standard four-wheel-drive Type 1 pumper truck with a 1,500-gallon-per-minute pump and a 750-gallon water tank.	Project applicant	Placer County Community Development Resource Agency	• As identified for Mitigation Measure 14.1a below	• As identified for Mitigation Measure 14.1a below

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 7.4b: The project applicant shall implement Mitigation Measure 14.7a. This Mitigation Measure requires the applicant to obtain a will-serve letter from the Alpine Springs County Water District (ASCWD) and to provide a fair-share contribution to the cost of upgrading the ASCWD Booster Pumps B, C, and D.	Project applicant	Placer County Community Development Resource Agency	• As identified for Mitigation Measure 14.7a below	• As identified for Mitigation Measure 14.7a below
Mitigation Measure 7.4c: Prior to approval of Improvement Plans, the project shall prepare a Construction Traffic Management Plan that shall be subject to approval by the Placer County Department of Public Works and Facilities. The goal of the Construction Traffic Management Plan will be to minimize traffic impacts to public streets and maintain a high level of safety for all roadway users. The plan will include the number and size of trucks per day, expected arrival/departure times, truck circulation patterns, location of truck staging areas, employee parking, and the proposed use of traffic control/partial street closures on public streets. The Construction Traffic Management Plan shall provide for attainment of the following performance standards to the satisfaction of the Department of Public Works and Facilities: • Delivery trucks shall not idle/stage within the public right-of-way. • Any proposed lane closures on Alpine Meadows Road shall be reviewed and approved by the Department of Public Works and Facilities at a minimum of one week prior to the proposed lane closure. • All construction employees shall park on site. • Roadways shall be maintained clear of debris (such as rocks) that could otherwise impede travel and impact public safety.	Project applicant	Placer County Community Development Resource Agency; Engineering and Surveying; and Placer County Department of Public Works and Facilities	• Construction Traffic Management Plan approved prior to Improvement Plan approval • Construction Traffic Management Plan implemented during all construction of roadways, infrastructure, and common area lot improvements	• Delivery trucks do not idle/stage within the public right-of-way. • Lane closures on Alpine Meadows Road are approved by the Department of Public Works and Facilities • All construction employees park on site. • Roadways are maintained clear of debris
Noise				
Mitigation Measure 8.4a: Construction noise emanating from any construction activities for which a grading or building permit is required shall be prohibited on Sundays and federal holidays, and shall occur only as follows: • Monday through Friday, 6:00 a.m. to 8:00 p.m. • Saturday, 8:00 a.m. to 6:00 p.m. The Placer County (County) Planning Services Division shall verify that these restrictions are indicated on the Grading and Improvement Plans prior to approval of the Improvement Plans or issuance of a grading permit.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval • Prior to issuance of grading permits • Compliance with performance standards must be achieved throughout all	• Construction activities are limited to the identified days and times

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
			construction activities, which may be verified by County site inspections	
Mitigation Measure 8.4b: The project applicant shall include the following note on the Improvement Plans: All construction equipment shall be fitted with factory-installed muffling devices, and all construction equipment shall be maintained in good working condition to lower the likelihood of any piece of equipment emitting noise beyond the standard decibel level for that equipment.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Construction equipment is equipped with mufflers and maintained in good working order
Mitigation Measure 8.4c: Include the following note on the Improvement Plans: • All equipment and vehicles shall be turned off when not in use. • Unnecessary idling of internal combustion engines shall be prohibited. • Idling shall be limited to no more than 5 minutes	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval	• Idling of construction equipment occurs for no more than 5 minutes at one time
Mitigation Measure 8.4d: Prior to issuance of grading and/or building permits, County staff shall ensure that project Grading and Improvement Plans identify locations for all stationary noise-generating construction equipment, such as air compressors, that are located as far as practical from nearby homes. Where such equipment must be located near adjacent residences, project Grading and Improvement plans shall include provisions to provide acoustical shielding of such equipment prior to issuance of grading and/or building permits.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval • Prior to issuance of grading permits • Prior to issuance of building permits	• Locations of stationary equipment are identified on improvement and grading plans • Stationary equipment is located far from existing homes and/or acoustical shielding is provided

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 8.4e: Prior to issuance of grading and/or building permits, County staff shall ensure that project Grading and Improvement Plans identify equipment and material storage locations that are sited as far as possible from nearby sensitive receptors.	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval • Prior to issuance of grading permits • Prior to issuance of building permits	• Locations of equipment and material storage are identified on improvement and grading plans • Equipment and material storage is located as far as possible from existing homes
Geology and Soils				
Mitigation Measure 11.2a: Prior to the approval of Improvement Plans, the project applicant shall submit a Construction Emission/Dust Control Plan to the Placer County Air Pollution Control District. This plan must address the minimum Administrative Requirements found in Sections 300 and 400 of Placer County Air Pollution Control District Rule 228, Fugitive Dust, and shall include the following requirements: a. Apply soil stabilizers to inactive areas b. Replace ground cover in disturbed areas quickly c. Water exposed surfaces three times daily d. Reduce speed on unpaved roads to less than 15 miles per hour e. Manage haul road dust by watering twice daily	Project applicant	Placer County Community Development Resource Agency; Planning Services Division and Placer County Air Pollution Control District	• Prior to Improvement Plan approval • Compliance with performance standards must be achieved throughout all construction activities, which may be verified by County site inspections	• Requirements of APCD Rule 228 are met • Soil in inactive areas is stabilized • Ground cover is replaced • Exposed surfaces are watered three times per day • Speed on unpaved roads is limited to 15 miles per hour • Haul roads are watered twice daily
Mitigation Measure 11.2b: The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer. The report shall incorporate the specific recommendations in the Geotechnical Engineering Report and the Geotechnical Engineering Report Update identifying construction and design standards that would protect structures from the effects of soil saturation and shall address and make recommendations on the following: a. Road, pavement, and parking area design b. Structural foundations, including retaining wall design	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division and Building Services Division	• Prior to Improvement Plan approval • Prior to approval of the CC&Rs • Prior to acceptance of the Development Notebook • Prior to recordation of the Final Map	• A final geotechnical engineering report is submitted and all recommendations of the report are implemented

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
c. Grading practices d. Erosion/winterization e. Special problems discovered on site (i.e., groundwater, expansive/ f. unstable soils) g. Slope stability h. Fault rupture Once approved by the Engineering and Surveying Division (ESD), two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report. If the soils report indicates the presence of critically expansive or other soils problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements of the soils report will be required for subdivisions prior to issuance of Building Permits. This certification may be completed on a lot-by-lot basis or on a tract basis. This requirement shall be so noted on the Improvement Plans; in the Covenants, Conditions, and Restrictions (CC&Rs); in the Development Notebook; and on the Informational Sheet filed with the Final Subdivision Map(s).				
Mitigation Measure 11.2c: The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval of each project phase. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees with the first Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval	• Improvement Plans meet the requirements of the LDM

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
reproduction cost shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements. Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety. The applicant shall provide five copies of the approved Tentative Subdivision Map(s) and two copies of the approved conditions with the plan check application. The Final Subdivision Map(s) shall not be submitted to the ESD until the Improvement Plans are submitted for the second review. Final technical review of the Final Subdivision Map(s) shall not conclude until after the Improvement Plans are approved by the ESD. No Building Permits shall be issued until, at a minimum, the Improvement Plans are approved by the ESD. Prior to the County's final acceptance of the project's improvements, the project applicant shall submit to the ESD two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record.				

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 11.2d: The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provision of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at 2:1 (horizontal:vertical) unless a soils report supports a steeper slope and the ESD concurs with this recommendation. The applicant shall revegetate all disturbed areas in accordance with the Improvement Plans. Revegetation undertaken from April 1 to October 1 shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization during project construction. Where soil stockpiling or borrow areas are to remain for more than one construction season, proper erosion control measures shall be applied as specified in the Improvement Plans/Grading Plans. Erosion control shall be provided where roadside drainage is off the pavement, to the satisfaction of the ESD. The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110% of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent. If, at any time during construction, a field review by Placer County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division; and Placer County DRC	• Prior to Improvement Plan approval	• Cut slopes are at a maximum slope of 2:1 unless otherwise approved • All disturbed areas are revegetated • Winterization is completed and all erosion control measures are maintained over winter • Letter of credit or cash deposit is submitted

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
for the revocation/modification of project approval by the appropriate hearing body.				
Mitigation Measure 11.4a: The project applicant shall implement Mitigation Measure (MM) 11.2c, which requires that Improvement Plans be submitted to and approved by Placer County prior to commencement of site preparation and construction activities.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measure 11.2c above	• As identified for Mitigation Measure 11.2c above
Mitigation Measure 11.4a: The project applicant shall implement MM 11.2d, which requires all site work to meet the Placer County Grading Ordinance requirements, and identifies requirements for erosion control measures to be included in project Improvement Plans.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division; and Placer County DRC	• As identified for Mitigation Measure 11.2d above	• As identified for Mitigation Measure 11.2d above
Mitigation Measure 11.4c: An Erosion Control Plan shall be prepared and submitted to the Placer County ESD. The Erosion Control Plan shall be submitted no later than 45 days prior to groundbreaking and the applicant shall not break ground prior to approval of the plan. Both the Dust Control Plan and the Erosion Control Plan shall comply with Placer County's Erosion Control standards and the Placer County Grading Ordinance. The plans shall incorporate best management practices (BMPs) for dust and erosion control during construction of site roadways and driveways, and during building pad grading. BMPs to minimize wind and water erosion shall include the following: 1. Timing grading activities to minimize the amount of exposed areas during the wet season, to the extent feasible. 2. Revegetating all areas that have been graded and will remain undeveloped during the rainy season by mid-October. Revegetation shall use native vegetation. Revegetated areas shall be secured from the possibility of erosion. 3. Preventing eroded soil from entering site drainageways through measures such as placement of hay bales or other acceptable materials such as sediment barriers, installation of temporary	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Requirements for implementing this measure are identified in site plans and contracts prior to issuance of grading permits and prior to issuance of building permits • Compliance with performance standards must be achieved throughout all construction activities, which may be verified by	• Grading and building plans and construction contracts include notes requiring conformance with the performance standards identified in this mitigation measure

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
earth berms, use of fabric silt fences, spreading hay or straw on exposed areas, and/or development of temporary settling areas. Sediment collected at the erosion control sites shall be collected and disposed of once vegetation has become established. 4. Preventing dust emissions through measures such as maintaining an operational water truck on site at all times and applying water to areas prior to and after disturbance to maintain adequate moisture in the soil to avoid dust emissions; suspending construction activities during periods of high winds; installing wind barriers to prevent dust emissions from leaving the project site; restricting vehicle and equipment speed to 15 miles per hour in construction areas; and controlling storage piles by keeping them wet, establishing and maintaining surface crusting, covering with tarp or vegetative cover, or installing wind barriers of 50% porosity around three sides of the pile.			County site inspections	
Mitigation Measure 11.4d: Improvement Plans shall show that water quality treatment facilities/BMPs shall be designed according to the guidance of the California Stormwater Quality Association's Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by the ESD). The Stormwater Quality Design Manual for the Sacramento and South Placer Regions is an additional guidance document that may be used as a reference for post-construction BMPs. Construction (temporary) BMPs for the project shall include Fiber Rolls (SE-5), Hydroseeding (EC-4), Stabilized Construction Entrance (LDM Place C-4), Straw Bale Barriers (SE-9), Storm Drain Inlet Protection (SE-10), Silt Fence (SE-1), revegetation techniques, dust control measures, and concrete washout areas.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to acceptance of subdivision improvements •	• Site-specific water quality treatment facilities/BMPs are identified on Improvement Plans • Site-specific water quality treatment facilities/BMPs include the specific facilities and BMPs identified and are consistent with the identified guidance documents • Site-specific water quality treatment facilities/BMPs are installed during construction

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 11.4e: Prior to commencement of construction, the applicant shall provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to the commencement of construction of the subdivision improvements •	• Project applicant submits evidence of a WDID number issued for the project
Mitigation Measure 11.4f: The Improvement Plan(s) shall identify the stockpiling and/or vehicle staging areas with locations as far as practical from existing dwellings and protected resources in the area.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval •	• Locations of vehicle and material storage are identified on improvement plans • Vehicle and material storage is located as far as possible from existing homes
Mitigation Measure 11.5a: The project applicant shall implement MM 11.2c and MM 11.2d, which require that all grading and construction be in accordance with the Placer County Grading Ordinance and shown on Improvement Plans, which must be approved by Placer County prior to commencement of construction activities. In addition, the project shall implement MM 11.4c, which requires the creation of an Erosion Control Plan that includes BMPs to limit erosion.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measures 11.2c, 11.2d, and 11.4c above	• As identified for Mitigation Measures 11.2c, 11.2d, and 11.4c above
Mitigation Measure 11.7a: The project applicant shall implement MM 11.2b, which requires that a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer be submitted to the Engineering and Surveying Division for review and approval with the project Improvement Plans. Further, the final geotechnical engineering report must address pavement and road design, foundations and retaining walls, grading, erosion control, unique site conditions such as groundwater and expansive soils, soil stability, and fault rupture.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division and Building Services Division	• As identified for Mitigation Measure 11.2b above	• As identified for Mitigation Measure 11.2b above

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Hydrology and Water Quality				
Mitigation Measure 12.1a: The project applicant shall implement Mitigation Measures 11.2d and 11.4c, which require that all proposed drainage improvements and vegetation removal be shown on Improvement Plans; that the project applicant revegetate all disturbed areas and provide financial assurance for implementation of the erosion control plan; and that all site grading and construction activities conform to the approved Improvement Plans.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division; and Placer County DRC	• As identified for Mitigation Measures 11.2d and 11.4c above	• As identified for Mitigation Measures 11.2d and 11.4c above
Mitigation Measure 12.1b: As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of improvement plan submittal.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval	• The Final Drainage Report is prepared in conformance with the LDM and Placer County Storm Water Management Manual
Mitigation Measure 12.1c: The project applicant shall implement Mitigation Measure 11.4e, which requires the project applicant to obtain a State Water Resources Control Board/Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit and provide appropriate documentation to the Placer County ESD prior to issuance of grading permits for any construction activity on site.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measure 11.4e above	• As identified for Mitigation Measure 11.4e above
Mitigation Measure 12.1d: The project applicant shall implement Mitigation Measure 11.4d, which requires the Improvement Plans to show	Project applicant	Placer County Community	• As identified for Mitigation	• As identified for Mitigation Measure

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
that water quality treatment facilities/BMPs shall be designed according to the guidance of the California Stormwater Quality Association's Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial.		Development Resource Agency, Engineering and Surveying Division	Measure 11.4d above	11.4d above
Mitigation Measure 12.2a: The Improvement Plans shall show that water quality treatment facilities/BMPs shall be designed according to the guidance of the California Stormwater Quality Association's Stormwater Best Management Practice Handbooks for New Development and Redevelopment, and for Industrial and Commercial (or other similar source as approved by the ESD. The Stormwater Quality Design Manual for the Sacramento and South Placer Regions is an additional guidance document that may be used as a reference for post construction BMPs. Storm drainage from on-site impervious surfaces shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, and others for entrapment of sediment, debris, and oils/greases, or other identified pollutants, as approved by the ESD. BMPs shall be designed at a minimum in accordance with the Placer County's Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. Post-development (permanent) BMPs for the project include vegetated swales (TC-30), detention basins (TC-22), and water quality inlets (TC-50). No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals. All BMPs shall be maintained as required to insure effectiveness. The project applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of ongoing maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by Placer County for maintenance. Prior to Improvement Plan or Final Map approval, easements shall be created and offered for dedication to Placer County for maintenance and access to these facilities in anticipation of possible County maintenance.	Project applicant, HOA	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to recordation of the Final Map • Prior to acceptance of subdivision improvements • Prior to acceptance of CC&Rs	• Site-specific water quality treatment facilities/BMPs are identified on Improvement Plans • Site-specific water quality treatment facilities/BMPs include the specific facilities and BMPs identified and are consistent with the identified guidance documents • Site-specific water quality treatment facilities/BMPs are installed during construction • HOA conducts routine maintenance of site-specific water quality treatment facilities/BMPs

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 12.2b: This project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit. The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management.	Project applicant, HOA	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to recordation of the Final Map • Prior to acceptance of subdivision improvements • Prior to acceptance of CC&Rs	• Permanent and operational source control measures are identified on Improvement Plans • Permanent and operational source control measures are consistent with the identified guidance documents • Permanent and operational source control measures are installed during construction • HOA conducts routine maintenance of permanent and operational source control measures
Mitigation Measure 12.2c: All storm drain inlets and catch basins within the project site shall be permanently marked/embossed with prohibitive language, such as "No Dumping! Flows to Creek" or other language as approved by Placer County ESD, and/or graphical icons to discourage illegal dumping. Message details, placement, and locations shall be included in the Improvement Plans. Placer County ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project site. The homeowners' association shall be responsible for maintaining the legibility of stamped messages and signs.	Project applicant, HOA	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to acceptance of subdivision improvements • Prior to acceptance of CC&Rs	• Message details, placement, and locations of storm drain inlets and catch basins are identified on Improvement Plans • Storm drain inlets, catch basins, and signage are installed during construction • HOA conducts routine maintenance of storm drain inlets, catch

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
				basins, and signage
Mitigation Measure 12.2d: The Improvement Plans shall show the snow storage areas from roadway snow removal. Snow storage shall not be plowed into or stored in a Stream Environment Zone (SEZ). Drainage from snow storage areas shall be directed towards onsite water quality facilities. This information shall be shown on the information sheet of the Final Map and shall be incorporated into the project CC&R's.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division; Planning Services Division	• Prior to Improvement Plan approval • Prior to recordation of the Final Map • Prior to acceptance of CC&Rs	• Snow storage areas meet County standards, are not located within an SEZ, and are designed to drain to water quality facilities
Mitigation Measure 12.3a: The Improvement Plans shall indicate construction of a new on-site stormwater drainage system that shall discharge to either an existing swale or channel or to an erosion control device designed to create a sheet flow condition.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval	• On-site stormwater drainage system discharges to an existing swale or channel or an erosion control device that creates a sheet flow condition
Mitigation Measure 12.3b: The Improvement Plan submittal and final Drainage Report shall provide details showing that storm water run-off shall be reduced to pre-project conditions at all discharge points from the property. The ESD may, after review of the project final drainage report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. Increased flows directly into Bear Creek shall be no more than 2 cubic feet per second. Retention/detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division (ESD) and shall be shown on the Improvement Plans. Maintenance of detention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. No retention/detention facility construction shall be permitted within any identified wetlands area,	Project applicant, HOA	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to acceptance of CC&Rs	• Stormwater run-off is reduced to pre-project conditions unless otherwise approved by ESD • Flows into Bear Creek are no more than 2 cubic feet per second greater than existing flows • Retention/detention facilities are designed consistent with the Placer County Stormwater

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
floodplain, or right-of-way, except as authorized by project approvals.				Management Manual • The HOA conducts routine maintenance of retention/detention facilities
Mitigation Measure 12.4a: On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s), show the limits of the future, unmitigated, fully developed, 100-year flood plain (after grading) for Bear Creek and the un-named tributary on the east side of the project and designate same as a building setback line unless greater setbacks are required by other conditions contained herein.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Prior to recordation of the Final Map	• The post-development 100-year floodplain for Bear Creek and the un-named tributary onsite are shown on Improvement Plans and Final Maps • The edge of the 100-year floodplain serves as the minimum building setback from Bear Creek and the un-named tributary onsite
Mitigation Measure 12.4b: On the Improvement Plans and Informational Sheet(s) filed with the appropriate Final Subdivision Map(s) show finished house pad elevations to be a minimum of two feet above the 100-year floodplain line (or finished floor -three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying Division. This certification shall be done prior to construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by the Engineering and Surveying Division and approved by the floodplain manager. Benchmark elevation and location shall be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of Development Review Committee.	Project applicant, developers of individual lots	Placer County Community Development Resource Agency, Engineering and Surveying Division; and Placer County DRC	• Prior to Improvement Plan approval • Prior to recordation of the Final Map • Prior to issuance of grading and building permits for individual lots • Prior to Development Notebook approval	• Finished house pads are a minimum of two feet above the 100-year floodplain or finished floor elevations are a minimum of three feet above the 100-year floodplain • Final pad elevations are certified by a California registered civil engineer or licensed land surveyor

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 12.4c: The Improvement Plans for the construction of the on site subdivision roads shall include the construction of a roadway bridges spanning the 100 year floodplain limits.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval	• Bridges are shown on Improvement Plans to span the 100-year floodplain limits
Mitigation Measure 12.4d: In order to protect site resources, no grading activities of any kind may take place within the 100-year flood plain of the seasonal stream and of Bear Creek, unless otherwise approved as a part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). A standard note to this effect shall be included on the Improvement Plans. The location of the 100-year flood plain shall be shown on the Improvement Plans.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• Prior to Improvement Plan approval • Throughout construction	• 100-year floodplain is shown on the Improvement Plans • No grading occurs within the 100-year floodplain unless otherwise approved • All grading conforms to the Placer County Flood Damage Prevention Regulations
Mitigation Measure 12.5a: The project applicant shall implement Mitigation Measure 12.2a, which requires Improvement Plans to include water quality treatment features and BMPs.	Project applicant, HOA	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measure 12.2a above	• As identified for Mitigation Measure 12.2a above
Mitigation Measure 12.5b: The project applicant shall implement Mitigation Measures 12.1a and 12.1b, which stipulate compliance with Placer County's requirements related to Improvement Plans, provision of a Final Drainage Report, and obtaining coverage under the NPDES program for site remediation and project construction activities.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measures 11.2d and 11.4c (referenced under 12.1a) and 12.1b above	• As identified for Mitigation Measures 11.2d and 11.4c (referenced under 12.1a) and 12.1b above

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
Mitigation Measure 12.5c: The project applicant shall implement Mitigation Measures 12.2a through 12.2c, which identify requirements related to BMP design and maintenance, storm drain inlet markings, and design of trash storage areas.	Project applicant	Placer County Community Development Resource Agency, Engineering and Surveying Division	• As identified for Mitigation Measures 12.2a through 12.2c above	• As identified for Mitigation Measures 12.2a through 12.2c above
Hazards and Hazardous Materials				
Mitigation Measure 13.1a: Prior to Improvement Plan approval, all trees that pose a risk to life and property shall be assessed by qualified personnel such as a certified arborist or Registered Professional Forester to the satisfaction of the Planning Services Division and a Fuel Modification Plan shall be approved by the North Tahoe Fire Protection District. The Fuel Modification Plan shall identify all hazard trees that pose a significant risk to life and/or property and shall include maps indicating the location of trees proposed for removal and the proposed procedures for removal. Locations of hazard trees shall also be indicated on Improvement Plans. All hazard trees within common areas (outside of individual lots) shall be removed with the onsite subdivision improvements. Where hazard trees occur within individual lots, removal of those trees must be included on Improvement Plans for the individual lot	Project applicant	Placer County Community Development Resource Agency, Planning Services Division; North Tahoe Fire Protection District	• Prior to Improvement Plan approval for subdivision improvements • Prior to acceptance of subdivision improvements	• Trees are assessed by a qualified professional • Hazard trees are identified and mapped • Hazard trees within common areas are removed •
Mitigation Measure 13.1b: The project applicant shall implement Mitigation Measures 14.1a and 14.1b requiring the applicant to submit will-serve letters from the North Tahoe Fire Protection District and Alpine Springs County Water District to Placer County prior to recordation of the Final Map, to purchase and donate and pumper truck to the North Tahoe Fire Protection District, and to make a fair-share contribution to the Alpine Springs County Water District toward the cost of upgrading three system-wide pump stations.	Project applicant	North Tahoe Fire Protection District; Alpine Springs County Water District; Placer County Community Development Resource Agency, Planning Services Division	• As required for Mitigation Measures 14.1a and 14.1b below	• As required for Mitigation Measures 14.1a and 14.1b below
Mitigation Measure 13.1c: Under Alternative A, the project shall prepare and implement an Emergency Preparedness and Evacuation Plan (EPEP). The EPEP shall establish requirements for the following: • Maintenance of internal roads by the Homeowners Association	Project applicant; HOA	Placer County Community Development Resource	• Prior to Improvement Plan approval • • HOA submits annual	• Physical improvements identified in the EPEP are included on

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
(HOA), • On-site storage of snow removal equipment, • Use of fire-resistant building materials for home construction, • Minimum standards to be met such that homes can be used as Shelter-in-Place facilities for project occupants, • Fuel reduction treatment and management of the entire project site, and • Recordation of easements for emergency vehicle access through the project site to United States Forest Service (USFS) property boundaries in two locations to allow for a connection through USFS lands in the future should the USFS determine that looped access throughout Bear Creek Valley could be provided. Under Alternative B, the project shall implement the proposed EPEP, which addresses maintenance of internal roads, on-site storage of snow removal equipment, use of fire-resistant building materials for home construction, minimum standards that will allow for the HOA facility to be used as a Shelter-in-Place facility, fuel reduction, and recordation of easements for emergency vehicle access through the project site. Under either alternative, prior to approval of Improvement Plans for each project phase, the applicant shall receive final approval from the Planning Services Division of an Emergency Preparedness and Evacuation Plan (EPEP) to detail the specific emergency preparedness measures incorporated into the project phase. Physical improvements of the EPEP, such as directional signage, shall be shown on the Improvement Plans. Additionally, under either alternative, the first phase EPEP must specify that if an avalanche occurs that affects Alpine Meadows Road and Road A, the HOA must hire a private contractor to clear the avalanche from the onsite private roadway.		Agency, Planning Services Division	report to Placer County Community Development Resource Agency	Improvement Plans and constructed with the subdivision improvements for each development phase • HOA retains full time on-site employee to conduct property maintenance identified in the EPEP
Mitigation Measure 13.1d: Prior to recordation of each Final Subdivision Map, Conditions, Covenants, and Restrictions (CC&Rs) shall be prepared and submitted for review and approval by the Engineering and Surveying Department, County Counsel, and other appropriate County Departments. CC&Rs shall be recorded concurrently with the filing of the Final Subdivision Map and shall contain notifications for the provision of an Emergency Preparedness and Evacuation Plan (EPEP). The provision	Project applicant; HOA	Placer County Community Development Resource Agency; Placer County Counsel	• County review and approval of CC&Rs prior to recordation of each Final Map • Recordation of the CC&Rs concurrent with recordation of	• CC&Rs include requirements to provide the EPEP to all property owners • HOA retains full time on-site employee to conduct property

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
shall specify, at a minimum, that the EPEP shall be provided to each property owner upon the sale of any lot or improved lot in this subdivision and that ongoing implementation of the EPEP shall be the responsibility of the Homeowners' Association.			each Final Map • HOA submits annual report to Placer County Community Development Resource Agency	maintenance identified in the EPEP
Mitigation Measure 13.2a: Prior to recordation of the first small lot Final Map that includes any residential lot in the eastern development pod, the project applicant shall purchase snow removal equipment, which at a minimum shall include a rubber tired, 4-wheel drive, front-end loader with a minimum 1.5-yard bucket capacity. The snow removal equipment shall be housed within the homeowners' association (HOA) caretaker unit on site. The HOA shall submit evidence annually to the Placer County Planning Division verifying that a full-time HOA caretaker qualified to conduct snow removal activities has been retained and is residing on site.	Project applicant; HOA	Placer County Community Development Resource Agency, Planning Services Division	• Prior to Improvement Plan approval, Placer County will verify the HOA residence includes storage for snow removal equipment • Prior to recordation of the first small lot Final Map that includes any residential lot in the eastern development pod, project applicant will submit evidence of purchase of snow removal equipment • HOA submits annual report to Placer County Community Development Resource Agency	• HOA residence incudes storage for snow removal equipment • Snow removal equipment is housed at the HOA residence • HOA retains full time on-site employee to conduct snow removal identified in the EPEP
Mitigation Measure 13.2b: Prior to the issuance of grading/building permits on Lots 2 and 3, the project engineer shall revise the site plans to ensure that the design of Lots 2 and 3 comply with the recommendations found in the Avalanche Hazard Study. These recommendations include avoidance of the small avalanche path on site or the incorporation of the rock outcropping into the structural design of these lots to hinder snow buildup on the rock. The design of Lots 2 and 3 shall comply with Section	Project applicant	Placer County Community Development Resource Agency, Planning Services Division	• Prior to issuance of grading and building permits for Lots 2 and 3	• Design of Lots 2 and 3 either avoids the avalanche path or incorporates the rock outcropping into the structural design • Design of Lots 2 and 3

Mitigation Measure	Implementation	Monitoring	Timing	Performance Evaluation Criteria
12.40.060 of the Placer County Code.				complies with Section 12.40.060 of the Placer County Code
Public Services and Utilities				
Mitigation Measure 14.1a: Prior to Improvement Plan approval and recordation of the Final Map, the project applicant shall submit to Placer County a will-serve letter from the North Tahoe Fire Protection District (NTFPD). Further, the project applicant shall purchase and donate to the NTFPD a standard four-wheel-drive Type 1 pumper truck with a 1,500-gallon-per-minute pump and a 750-gallon water tank, unless otherwise required by the NTFPD.	Project applicant	Placer County Community Development Resource Agency; NTFPD	• Prior to Improvement Plan approval • Prior to recordation of the first Final Map	• Project applicant submits a will-serve letter from NTFPD • Project applicant purchases the pumper truck as described and donates it to NTFPD
Mitigation Measure 14.1b: Prior to Improvement Plan approval and recordation of each Final Map, the applicant shall provide a will-serve letter from the Alpine Springs County Water District (ASCWD) to describe terms under which the District will provide water service to the project. The project applicant shall also make a fair-share contribution toward the cost of upgrading three system-wide pump stations (Booster Pumps B, C, and D) to ensure adequate water supply and pressure to serve the proposed project and to increase water supply reliability and pressure throughout the ASCWD service area, unless otherwise approved by the ASCWD. This contribution shall be made to ASCWD prior to recordation of each Final Map.	Project applicant	Placer County Community Development Resource Agency; ASCWD	• Prior to Improvement Plan approval • Prior to recordation of each Final Map	• Project applicant submits a will-serve letter from ASCWD • Project applicant makes a fair-share contribution towards the pump station upgrades described
Mitigation Measure 14.1c: The project applicant shall implement MM 7.4c, which requires the applicant to prepare a Construction Management Plan and obtain approval be the Placer County Department of Public Works and Facilities Transportation Division.	Project applicant	Placer County Community Development Resource Agency and Placer County Department of Public Works and Facilities	• As identified for Mitigation Measure 7.4c above	• As identified for Mitigation Measure 7.4c above
Mitigation Measure 14.7a: The project applicant shall implement MM 14.1b which requires the applicant to provide a will-serve letter from the ASCWD and make a fair-share contribution toward the cost of upgrading three system-wide pump stations (Booster Pumps B, C, and D).	Project applicant	Placer County Community Development Resource Agency; ASCWD	• As identified for Mitigation Measure 14.1b above	• As identified for Mitigation Measure 14.1b above

Cumulative Impacts				
Mitigation Measure 15.5a: This project will be subject to the payment of traffic impact fees that are in effect in this area (Tahoe Fee District), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) will be required and shall be paid to Placer County DPW prior to issuance of any Building Permits for the project: A. County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code The current estimated fee is $4,846 per single family residence. The fees were calculated using the information supplied. If either the use or the square footage changes, then the fees will change. The actual fees paid will be those in effect at the time the payment occurs.	Project applicant for construction of the HOA residence, developers of individual lots	Placer County Community Department of Public Works and Facilities	• Prior to issuance of building permits	• Traffic mitigation fees are paid for each residence
Mitigation Measure 15.5b: Prior to recordation of the Final Map, the applicant shall establish a new Zone of Benefit (ZOB) within an existing County Service Area (CSA) or annex into a pre-existing ZOB to provide adequate funding of capital and ongoing operational transit services/requirements. The applicant shall submit to the County for review and approval a complete and adequate engineer's report supporting the level of assessments necessary for the establishment of the ZOB. The report shall be prepared by a registered engineer in consultation with a qualified financial consultant and shall establish the basis for the special benefit appurtenant to the project.	Project applicant	Placer County Community Department of Public Works and Facilities	• Prior to recordation of the first Final Map	• The project site is part of a new or existing ZOB, with funding levels consistent with an engineer's report
Mitigation Measure 15.7a: Prior to approval of Improvement Plans, the applicant shall provide a written calculation to the Placer County Air Pollution Control District (APCD) for approval demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used during the grading phases of the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20% oxides of nitrogen (NOx) reduction as compared to the California Air Resources Board statewide fleet average emissions. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The Construction Mitigation Calculator available at the following link shall be used to calculate compliance with this condition: http://www.airquality.org/ceqa/mitigation.shtml. The completed calculator worksheet shall be submitted to the Placer County APCD prior to the start of construction.	Project applicant	Placer County Air Pollution Control District	• Prior to approval of Improvement Plans	• The project-wide fleet average NOx emissions for off-road vehicles used during grading is 20% less than the statewide fleet average emissions

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CHAPTER 5
REFERENCES

MASTER RESPONSES

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CHAPTER 6
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