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cont'd

The physical or biological features essential to the conservation of the Sierra Nevada yellow-legged frog in the Five Lakes subunit may require special management considerations or protection due to the presence of introduced fishes, timber management and fuels reduction, and recreational activities."

Barstool Lake is the only habitat known in the project vicinity to be currently occupied by SNYLF. However, Table 5 of the Sierra Nevada Yellow-legged Frog Biological Assessment shows that SNYLF was detected in Barstool Lake in 2004, it was not detected there in 2011, but was detected again in 2015, 2016, and 2017. Therefore, either SNYLF was present in Barstool Lake continuously from 2004-2017 and just was not detected in 2011, or it was locally extirpated and recolonized the habitat. Thus, the distribution and abundance of SNYLF may be underestimated if they avoid detection. Alternatively, as is described in Section 4.14, the project area provides all of the habitat features required by SNYLF, including adequate upland dispersal habitat, which allows the species to periodically recolonize unoccupied habitats, thereby increasing the overall quality of the area to the species. This is precisely why it is considered a Critical Habitat Subunit.

0167-16

The Biological Opinion (BO) for the SNYLF in the Sierra Nevada Forests (2017) states that full implementation of all Programmatic Conservation Measures (RPMs) is "essential." These measures are intended to avoid and minimize the potential effects of potential projects, and Forest Service Standards & Guidelines and RPMs are treated as "minimum" requirements by the BO. The proposed project is inconsistent with the resource protection goals and objectives of the TNF LRMP, SNFPA, Designated SNYLF critical habitat, Sierra Nevada SNYLF BO, and Placer County General Plan policies requiring avoidance of sensitive resources as the top priority. The proposed project does not avoid or minimize impacts to wildlife and aquatic resources, and, in particular, does not avoid or minimize impacts to the SNYLF and its Critical Habitat. As proposed, the project would cause further adverse and unmitigable impacts to Critical Habitat and a population of an already imperiled Federally Endangered and California Threatened species.

0167-17

The proposed project adversely affects aquatic resources, and would cause significant impacts to the SNYLF. The TNF LRMP states that there are already existing "intense recreational impacts in the Five Lakes Basin" that Alternative 2 of the proposed project could exacerbate through a variety of direct and indirect impacts that are outlined in Section 4.14. However, given the lack of detail in the project description, it is unclear if the assumptions used to calculate impacts to wildlife and aquatic resources are appropriate. For example, the document suggests that impacts to the species could occur through accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity, but there is no specific discussion or quantification of these potential impact factors, and the analysis assumes an impact corridor of just 20-25 feet wide. This assumption is not justified by a detailed description of the types of equipment and noise levels expected to be generated, the level of human activity, amount of chemicals, quantity and disposition of blasted materials, etc., and therefore it is unlikely that potential project impacts associated with these factors have been adequately assessed, especially considering the terrain. The section does suggest that chemicals with known toxicity to amphibians (e.g., 2,4-Dinitrotoluene) can be generated by the project; however, the use of an LD50 (Lethal Dose to 50% of the test organisms) as an impact standard is inappropriate for a federally listed endangered species.

0167-18

Section 4.14 states "Long-term impacts on biological resources would occur in or adjacent to habitats that would experience a permanent conversion in land use and cover (i.e., conversion of natural

0167-15 cont'd, Wildlife and Aquatics (W&A)

The definition of "occupied" as used in the paragraph referenced by the commenter comes from the US Fish and Wildlife Service Amendment of the Programmatic Biological Opinion on Nine Forest Programs on Nine National Forests in the Sierra Nevada of California for the Endangered Sierra Nevada Yellow-legged Frog, Endangered Northern Distinct Population Segment of the Mountain Yellow-legged Frog, and Threatened Yosemite Toad (USFWS 2017). In this document, the Service defines the types of habitat (i.e., occupied), and the likelihood that listed amphibians are present is based on existing available survey data collected within the last 10 years or new survey data collected for the project. In this case Barstool Lake was considered occupied because frogs were observed in 2015. If no Sierra Nevada yellow-legged frogs had been observed at Barstool Lake during the project surveys, the habitat would have been considered as *unutilized potential* (not occupied) as per the PBO.

0167-16, Wildlife and Aquatics (W&A)

Appendix B of the Draft EIR/EIS contains all the Resource Protection Measures (RPMs) included as part of the action alternatives. The RPMs were developed by the Forest Service and Placer County and resource specialists in the pre-analysis and analysis phases to reduce environmental impacts and comply with applicable laws and regulations. They include, but are not limited to, best management practices (BMPs), Forest Service standards and guidelines, Placer County standard permit conditions, and standard operating procedures. RPMs come from federal, state, and local laws, regulations, and policies; forest plans; scientific research; and the experience provided by lead agencies and consulting specialists in designing similar projects.

The comment asserts that the proposed project does not avoid or minimize impacts on sensitive resources, including aquatic resources and SNYLF and its critical habitat. However multiple RPMs in Section 4.14, "Wildlife and Aquatics" call for avoidance of these resources, including RPM BIO-9 (avoidance or rare plants), BIO-21 (special-status birds), BIO-26 (aquatic habitats). Avoidance of impacts on aquatic habitats would also result in avoidance of potential adverse effects on SNYLF. Avoidance of impacts on aquatic habitat within designated SNYLF critical habitat areas would also result in

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avoidance of potential adverse effects on SNYLF critical habitat.

As set forth in the Draft EIS/EIR, the proposed project and action alternatives would have direct and indirect effects on SNYLF critical habitat. The project incorporates multiple RPMs to lessen these impacts, to the extent feasible, as required by Forest Service and County policy. For those impacts that cannot feasibly be avoided, mitigation is recommended that would require compensatory habitat. For this reason, the project would not result in a net reduction of SNYLF critical habitat.

0167-17, Wildlife and Aquatics (W&A)

The comment states that the proposed project adversely affects aquatic resources, and would cause significant impacts to SNYLF. This statement is consistent with the Draft EIS/EIR's analysis. (See Draft EIS/EIR, Impact 4.14-1 (Alt. 2): Direct and Indirect Effects on Sierra Nevada Yellow-Legged Frog.)

The comment notes that the TNF LRMP states that there are already existing "intense recreational impacts in the Five Lakes Basin" that Alternative 2 of the proposed project could exacerbate through a variety of direct and indirect impacts that are outlined in Section 4.14. The comment states that there is insufficient information to determine whether the assumptions used to calculate impacts to wildlife and aquatic resources are appropriate. The comment also states that the EIS/EIR provides insufficient information to assess impacts to SNYLF through accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity.

Analysis of direct and indirect effects on Sierra Nevada yellow-legged frog which include accidental releases of chemicals and hazardous materials, elevated construction noise, and increased human activity are included in Impact 4.14-1 (Alt. 2, Alt. 3, and Alt. 4) of the Draft EIR/EIS. For example, on page 4.14-48 of the Draft EIS/EIR it is stated "Indirect effects on SNYLF could also occur through the accidental introduction of hazardous materials and chemicals in the form of gasoline, engine oil, lubricants, or other fluids used during construction activities that could potentially enter Barstool Lake or the seasonal streams as a result of spills." Construction noise is

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also addressed on page 4.14-48, and disturbance from human activity is addressed on pages 4.14-48 and 4.14-49.

The comment states that the analysis assumes an impact corridor of 20-25 feet wide. The survey area was 100 feet from each side of centerline of the gondola alignments under each action alternative. Potential impacts of the alternatives on wildlife and aquatic resources were initially identified by overlaying GIS layers of conceptual project components and construction disturbance areas on the land cover maps of the project site and maps of sensitive biological resources. These disturbance areas are shown in Exhibit 4.15-1 and represent the best available information regarding anticipated construction activities for each action alternative. Construction disturbance areas, where they are linear corridors, are all greater than 25 feet wide (with some locations wider than others to accommodate topography and planned facilities). Any natural community and wildlife habitat that overlapped with an area of proposed modification was considered to be directly affected during project construction by that respective alternative. Potential impacts associated with the alternatives were classified as either direct, indirect, or cumulative. Section 4.14.2.1 Methods and Assumptions describe these classifications. Additionally, acreages included in Table 4.14-6 summarize the estimated maximum amounts of habitat alteration or loss assumed for the construction of the action alternatives. Habitat impacts that would occur as a result of constructing temporary access roads and utilities were estimated based on 25-foot width for the access roads; and 20-foot width for the powerline to terminals. These estimates are conservative; the actual amount of habitat affected within those areas is expected to be less. Moreover, RPMs require the applicant to identify and, to the extent feasible, avoid sensitive habitats; these RPMs will require narrower disturbance corridors than those assumed in the EIS/EIR analysis.

The comment also identifies 2,4-Dinitrotoluene as a chemical that can be generated by the project. 2,4-Dinitrotoluene is one of several explosive-residue byproducts from explosive "hand shots" from avalanche mitigation containing pentaerythritoltetranitrate (PETN). The project proposed to use the Gazex avalanche mitigation system, which would have reduced the explosive-residue byproducts to carbon dioxide and water. With the elimination of the Gazex component of the project description, there will be no change in avalanche control methods as compared to existing practices, and no impact will occur.

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The comment also assumed that the LD50 of 2,4-Dinitrotoluene was being used as a standard for the Sierra Nevada yellow-legged frog. The LD50 of 2,4-Dinitrotoluene referenced in the analysis was included to show that the LD50 value of 1,098 milligrams per kilogram on bullfrogs is extremely high when compared to the relatively low concentrations typically observed in the aquatic environments where the U.S. Army Public Health Command on Wildlife Toxicity did their assessments for the referenced research.

The comment identifies areas where, in the commenter's view, additional detail is needed to assess project impacts. The EIS/EIR provides sufficient detail and data to adequately assess the severity and significance of the project's impact on SNYLF. For example, the EIS/EIR acknowledges that oil, lubricants and other materials are typically used during construction, and that if these materials are accidentally released into the environment, SNYLF could be adversely affected. (Draft EIS/EIR, Impact 4.14-1 (Alt. 2), p. 4.14-48.) The implementation of various RPMs in the HAZ category identified in the impact discussion would prevent spills and releases from occurring. (See Draft EIS/EIR, Appendix B, pp. B-7 - B-8.) Detailed information on the type and volume of hazardous materials used during construction is unavailable. Moreover, such detail is not necessary to evaluate the potential impact because an understanding of the general character of materials used during construction, and sufficient RPMs to prevent releases, is sufficient to determine that SNYLF would not be adversely affected.

0167-18, Wildlife and Aquatics (W&A)

The comment references text in Subsection 4.14.2.1 Methods and Assumptions under Section 4.14, "Wildlife & Aquatics," of the Draft EIS/EIR. This section describes concepts such direct and indirect effects and provides both a detailed (e.g., use of GIS layers) and broader conceptual explanation of how impacts were considered and assessed. The paragraph where the quoted text occurs (Draft EIS/EIR page 4.14-34) is provided below. The quoted text is from the last sentence. The subsequent two paragraphs are also provided. The EIS/EIR addresses impacts on wildlife and aquatics in detail in the subsequent individual impact discussions, using the methodology described in Section 4.14.2.1. The comment

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provides no examples or evidence indicating that the impact discussions are insufficient.

"Potential impacts of the alternatives on wildlife and aquatic resources were initially identified by overlaying GIS layers of conceptual project components on the land cover maps of the project site and maps of sensitive biological resources. Any natural community and wildlife habitat that overlapped with an area of proposed modification was considered to be directly affected during project construction by that respective alternative. An estimate of the amount of vegetation removal planned for the clearing of work areas and access ways was estimated to the extent possible. Short-term construction impacts would occur where natural vegetation would be removed to construct new features and facilities or modify existing features. Construction-related impacts could affect biological resources through vegetation disturbance, noise disturbances, stormwater runoff, erosion, and the introduction of invasive or nonnative species. Long-term impacts on biological resources would occur in or adjacent to habitats that would experience a permanent conversion in land use and cover (i.e., conversion of natural vegetation due to installation of towers, and other facilities).

Table 4.14-6 summarizes the estimated maximum amounts of habitat alteration or loss assumed from the construction of the action alternatives. Additional habitat impacts would occur as a result of constructing temporary access roads and utilities. These additional habitat alterations have been estimated based on the following assumptions of affected areas: 25-foot width for the access routes; and 20-foot width for the powerline to terminals (where needed). These estimates are conservative because the actual habitat impacts within those areas is expected to be less.

Impacts on common and sensitive habitats could occur through changes in the amount, distribution and pattern, quality, and function of those communities as a result of project construction and operation. Impacts on special-status species could occur either through short-term habitat degradation/alteration or permanent habitat loss; disturbance of normal activity, reproduction, and dispersal patterns during construction; or through direct mortality. Potential impacts on special-status species were determined by analyzing species life history requirements and known occurrences or potential to occur on the project site. Once the species and habitats were identified, impacts from project activities were analyzed. Direct and Indirect effect analysis is included under Section 4.14

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"Wildlife and Aquatics" which start on page 4.14-41 of the Draft EIS/EIR."

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vegetation due to installation of towers, and other facilities).” What are the nature of the long-term impacts that would occur “adjacent to habitats that would experience a permanent conversion in land use and cover”? These long-term impacts have not been adequately described and quantified.

0167-19

It is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.

0167-20

Impacts to SNLYF must be avoided to the extent practicable, and the proposed project does not achieve this standard. Section 4.14 acknowledges (pg. 4.14-42) that “Implementation of the project would be adverse and is likely to adversely affect SNLYF and its habitat.” Resource Protection Measures (RPMs) and Mitigation Measures are offered to reduce these impacts to an acceptable level. However, the majority of the RPMs merely require personnel training, additional planning and consultation, or an undefined compensatory mitigation program that in my professional experience cannot eliminate the risk of adverse impacts to this highly sensitive resource that would occur if the proposed project was to proceed. Ultimately, mitigating impacts to SNLYF and its Critical Habitat are deferred to a future “consultation with permitting agencies” and an undefined compensatory mitigation plan. Detailed, specific measures that demonstrate how the project would adequately avoid, minimize, then mitigate impacts must be provided now to understand if project impacts actually can be adequately mitigated.

0167-21

The analysis of cumulative impacts is insufficient. The Section acknowledges “Some past and current projects in the region have contributed to an adverse cumulative effect on aquatic habitats” and that the current project will adversely affect wildlife and aquatic resources, but that project design, construction methods and RPMs would result in no cumulative impacts of this project. The document states “Specifically, these measures require that (1) aquatic habitat be avoided to the extent feasible; (2) aquatic habitats that cannot be avoided be restored following construction; (3) any unavoidable losses be compensated for in a manner that results in no net loss of aquatic habitats; and (4) project implementation be consistent with the aquatic and riparian habitat protection provisions of CWA, RWQCB, Fish and Game Code Section 1602, and the Forest Service.” However, has been discussed previously, the proposed project does not avoid aquatic habitat to the extent feasible, is not consistent with many of the regulations and policies cited, and proposed RPMs and Mitigation Measures will not prevent or compensate for the degradation of a highly sensitive and imperiled resource. Cumulative impacts of the proposed project to wildlife and aquatic resources, particularly SNLYF and its Critical Habitat are significant and unmitigated as proposed.

Section 4.15 Wetlands

0167-22

As discussed for Section 4.12 (Vegetation) the significance of impacts should be assessed based on the intensity of the effects within the context that they occur. Project facilities should avoid high quality resources to the extent feasible, but the document does not provide adequate information to make this determination. This section also does not analyze the project impacts for consistency with the objectives for the Granite Chief Management Area.

0167-23

Given the lack of detail presented in the Description of Alternatives, the impact analysis is inadequate, particularly for indirect impacts. For example, the disposition of blasted materials and nature and quantities of chemicals generated by the project could have significant impacts to wetland habitats, and the current project description is inadequate to make that determination.

0167-18 cont'd, Wildlife and Aquatics (W&A)

0167-19, Wildlife and Aquatics (W&A)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, “Master Responses,” for more information on the removal of Gazex from the project.

0167-20, Wildlife and Aquatics (W&A)

Page 4.14-42 analyzes direct and indirect effects on SNLYF critical habitat under Alternative 1 (the no action alternative), which results in a no effect on SNLYF critical habitat under both NEPA and CEQA.

The comment may be referring to Impact 4.14-1(Alt. 2), which states that implementation of Alternative 2 would result in direct and indirect effects, such as loss of individual SNLYF or occupied habitat. Under NEPA, and considering the NEPA indicators, absent RPMs and/or mitigation, direct and indirect impacts on SNLYF would be adverse. However, implementation of RPMs MUL-1 through MUL-7, HAZ-1, HAZ-3, HAZ-6 through HAZ-8, BIO-1, BIO-7, BIO-18, BIO-19, BIO-21 through BIO-36, BIO-39, SOILS-1, SOILS-3 through SOILS-5, SOILS-9, SOILS-11, SOILS-12, WQ-1, WQ-4 through WQ-6, WQ-8 through WQ-20, TREE-1, TREE-6, and TREE-7 would partially mitigate the effects on these resources through habitat avoidance, habitat restoration, and direct species protection measures. See Sections 4.6, 4.9, 4.16, and 4.17, which list additional RPMs that would reduce effects on special-status aquatic wildlife. The comment states that the project is inconsistent with the avoidance of SNLYF impacts where feasible. A number of the RPMs incorporated into the project focus on avoidance of such impacts. (See, e.g., RPM BIO-19, which requires avoidance of SNLYF, and limits disturbance around riparian conservation areas.) However, because the RPMs do not contain mechanisms for compensating for the loss of all potential suitable habitat, these effects are addressed by Mitigation Measure 4.14-1 (Alt. 2) through consultation with permitting agencies. Thus, multiple RPMs require avoidance and minimization of impacts, and Mitigation Measure 4.14-1 (Alt. 2) requires compensation

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where complete avoidance is infeasible. See response to comment 0167-16, above.

0167-21, Wildlife and Aquatics (W&A)

The comment states that the analysis of cumulative impacts is insufficient. Cumulative Effects are analyzed in subheading 4.14.4 Cumulative Effects on page 4.14-110 of the Draft EIS/EIR. The comment does not identify the specific reasons why the cumulative impact analysis is insufficient or inadequate. The comment reiterates issues addressed in comments/responses above. See the responses above related to these issues.

The comment also quotes findings within the cumulative analysis but states that the proposed project does not avoid aquatic habitat to the extent feasible, is not consistent with many of the regulations and policies cited, and proposed RPMs and Mitigation Measures will not prevent or compensate for the degradation of highly sensitive and imperiled resource. Cumulative Effects are analyzed in subheading 4.14.4 Cumulative Effects starting on page 4.14-110 of the Draft EIS/EIR. The comment does not provide specific reasons specifying how the project does not avoid aquatic habitat to the extent feasible, how it is not consistent with the provisions of the CWA, RWQCB, Fish and Game Code 1602, and the Forest Service, or how the RPMs and Mitigation Measures do not prevent or compensate for the degradation of "highly sensitive and imperiled resource". Again, see responses above identifying why the implementation of RPMs and mitigation measures follow the suggested sequence of avoidance and mitigation and is consistent with provisions of applicable laws and regulations. As noted in response to comment 0167-21, RPMs require avoiding and minimizing impacts to SNYLF wherever feasible. Compensatory mitigation, as required by Mitigation Measure 4.14-1, has been identified in those instances where such avoidance and minimization is infeasible.

0167-22, Wetlands (W1)

See response to comment 0167-8, above, which addresses Draft EIS/EIR Section 4.12, "Vegetation."

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See response to comment 0167-2, above, regarding the action alternatives and the Granite Chief Management Area.

The comment states that project facilities should avoid high quality resources to the extent feasible, and states further that the EIS/EIR does not provide adequate information to make this determination. The comment provides no examples or evidence regarding the perceived inadequacy of EIS/EIR information. Section 4.15, "Wetlands," of the Draft EIS/EIR assesses the effects of the project on wetland resources based on wetland/habitat type, making distinctions between ponds, mountain alder thicket, freshwater emergent wetland, etc. All action alternatives have total wetland impacts between 1.44 and 1.75 acres (see Draft EIS/EIR Tables 4.15-2 through 4.15-4). Providing information on the type and acreages of wetland habitats affected is sufficient to assess the intensity/significance of environmental effects on these resources. In addition, the RPMs require, in order of priority, (1) avoidance, (2) minimization, (3) restoration, and (4) compensation, with compensation relied upon only where avoidance, minimization and restoration have already been applied, and further avoidance/minimization/restoration is infeasible. This same approach is applied to all resources that fall under the jurisdiction of applicable wetland regulations. Preliminary design of the project elements and proposed construction areas has been designed to minimize impacts to sensitive areas, including wetlands, as much as possible. RPMs BIO-24, BIO-25, BIO-26 would require minimization of ground disturbance and vegetation removal, especially in riparian areas/RCAs; any work conducted within 100 feet of waters of the United States, waters of the State, and wetlands, and within RCAs designated by the Forest Service will require the presence of an environmental monitor to oversee the activities. Furthermore, if an aquatic habitat cannot be fully avoided, prior to disturbance of the habitat, a delineation of the water of the United States would need to take place and would have to be submitted to the USACE for verification, and affected wetlands would have to be restored, or compensation would have to be provided, in order to meet the "no net loss" policy of USACE.

0167-23, Wetlands (W1)

The comment states that the Draft EIS/EIR does not provide sufficient detail regarding the disposition of blasted materials and the nature and quantity of chemicals generated by the

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project to assess the significance of impacts these materials could have on wetland habitats.

The Draft EIS/EIR Chapter 2, "Description of Alternatives," identifies that neither materials generated by blasting nor chemicals generated by the project (hereafter referred to as hazardous materials in this response) would enter wetland habitats; therefore, no significant adverse effect on wetlands would occur as described below.

Chapter 2, "Description of Alternatives," describes a reasonable range of alternatives for the project, along with general construction, operation and long-term maintenance. As part of the general construction, blasting may be required for the Squaw Valley mid-station, Alpine Meadows mid-station and some tower footings. The overall disturbance from blasting would be dependent on location. Blasting typically involves drilling holes in the rock for the explosives using pneumatic drilling equipment. As stated on Page 2-13 of the Draft EIS/EIR, for blasting, typically an array of several holes is drilled, loaded, and wired to a detonator, and the array is triggered in a single "shot." When there is a need to protect structures or sensitive resources, blasting mats would be laid over the array of holes to contain the explosion and reduce the amount of shot rock, or eliminate it, from flying out of the immediate vicinity of the blasting zone. After the blast, excavators may be needed to remove debris and achieve the necessary excavation. The blasted rock would be incorporated into the surrounding disturbance areas (Draft EIS/EIR page 2-13). Wetlands qualify as a "sensitive resources," therefore, blasting mats would be used to prevent "shot rock" from leaving the blasting site and entering wetlands. Blasting sites are included in the construction disturbance area defined for each alternative. Therefore, blasting, and the incorporation of blasted rock "into the surrounding disturbance areas" would not result in wetland habitat impacts beyond those identified in the Draft EIS/EIR (as described in Sections 4.12, "Vegetation;" 4.14, "Wildlife and Aquatics;" 4.15, "Wetlands;" and 4.17, "Hydrology and Water Quality"). In addition, RPM WQ-8 requires that no debris be placed in wetlands (which would include blasted rock) and RPM BIO-25 requires that an environmental monitor be present if work is to occur within 100 feet of waters of the United States, waters of the State, wetlands, and within RCAs designated by the Forest Service. The monitor would assist in ensuring that impacts to wetland habitats do not exceed those identified in the Draft EIS/EIR and/or subsequent permits from regulatory agencies (e.g.,

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USACE). Multiple other RPMs also address the avoidance and protection of wetland habitats. The information provided here is sufficient to identify that blasting activities would not result in effects on wetland habitats different from those already identified in the Draft EIS/EIR.

Similarly, there are multiple RPMs identified in the Draft EIS/EIR, as well as existing regulations, that address the prevention of hazardous materials from entering wetland habitats. For example, the description of the regulatory setting provided in Section 4.17, "Hydrology and Water Quality" describes the Clean Water Act Section 401 and 402 National Pollutant Discharge Elimination System (NPDES), NPDES Permits, the California Porter-Cologne Water Quality Control Act, and the General Permit for Storm Water Discharges Associated with Construction Activity, all of which have a role in preventing hazardous materials from entering waterways. In addition, RPMs MUL-6, HAZ-1, HAZ-5, HAZ-6 HAZ-7, and HAZ-8 all relate to the proper use, storage, and disposal of hazard materials and preventing the release of hazardous materials. Please see response to comment 0167-17, above. There is sufficient evidence in the Draft EIS/EIR to conclude that the potential for a release of hazardous materials that could adversely affect wetland habitats is not sufficient to result in a significant adverse effect.

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0167-24, Wetlands (W1)

The comment states that the project is inconsistent with federal, state, and local policies on wetland protection and provides examples which include the Sierra Nevada Forest Plan Amendment's (SNFPA's) Aquatic Management Strategy goals that are to "maintain and restore" wetlands and special aquatic habitats; Placer County General Plan Policy 6.B.2 which seeks "no net loss" of wetlands by prioritizing avoidance of impacts to wetlands to compensatory mitigation, which is consistent with EPA's "mitigation sequencing" guidelines for wetlands.

Section 4.15, "Wetlands," analyzes effects to wetland resources. To minimize impacts to wetland resources the project includes several RPMs to further minimize effects, including preventing erosion and runoff, and requiring that aquatic habitats be avoided to the extent feasible. If avoidance is infeasible, then a wetland delineation must be prepared and submitted to USACE, and compensation must be provided such that there is "no net loss" of wetland habitat.

The RPMs are consistent with the approach of (1) avoiding wetlands, (2) minimizing disturbance, (3) restoring disturbance in place, and (4) providing compensatory habitat as a final option. As stated in RPM BIO-26, "[t]he project will be designed to avoid disturbance to, and vehicle travel in, identified aquatic habitats..." If an aquatic habitat cannot be fully avoided, then the permitting process for fill of wetland habitats will be implemented. However, even if the permitting process is initiated, RPM BIO-26 identifies in the last sentence that "[i]mpacts will be minimized to the extent practicable." RPM BIO-26 identifies that disturbed wetland areas will be restored to pre-project conditions, and provides consistency with the USACE no net loss policy as a performance criteria.

The statements in the comment regarding the effects of Alternative 2 on wetland resources relative to the other action alternatives is correct, consistent with the results provided in Tables 4.15-2 through 4.15-4 of the Draft EIS/EIR. This information is incorporated into the determination of the Environmentally Superior Alternative provided in Section 5.2.4 of the Draft EIS/EIR.

0167-25, Wetlands (W1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR.

0167-24

The project is inconsistent with federal, state, and local policies on wetland protection. For example, the Sierra Nevada Forest Plan Amendment's (SNFPA's) Aquatic Management Strategy goals are to "maintain and restore" wetlands and special aquatic habitats. Placer County General Plan Policy 6.B.2 seeks "no net loss" of wetlands by prioritizing avoidance of impacts to wetlands to compensatory mitigation, which is consistent with U.S. EPA's "mitigation sequencing" guidelines for wetlands. The proposed project does not prioritize avoidance of wetland impacts but relies on undefined future compensatory mitigation to reduce the project's significant impacts. In fact, the proposed project would incur greater wetland impacts than at least one of the other action alternatives, even without refining the analysis of impacts with additional details on construction and removing the avalanche mitigation system from Alternatives 3 and 4.

0167-25

It is not clear that the analysis of impacts for Alternatives 3 and 4 adequately assessed the impacts associated with construction of the proposed avalanche mitigation system.

0167-26

The cumulative impact section is inadequate. CEQA defines the cumulative impact from several projects as the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The document states that cumulative conditions are already adversely affected, but suggests that since there are laws and regulations requiring avoidance, minimization, and mitigation of wetland and waters impacts, there is no cumulative impact of the proposed project. This is circular logic at best since the proposed project itself doesn't follow these mitigation sequencing guidelines. The proposed project would clearly cause a cumulatively significant adverse impact to wetlands and aquatic habitats.

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However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0167-26, Wetlands (W1)

The comment states that the analysis of wetlands impacts is inadequate, provides a summary of the CEQA cumulative impact definition, and cites the Draft EIS/EIR's statement that cumulative conditions are already adversely affected, but suggests that since there are laws and regulations requiring avoidance, minimization, and mitigation of wetland and waters impacts, there is no cumulative impact of the proposed project. The comment labels this approach as "circular logic" and states that the proposed project does not follow appropriate policies concerning the hierarchy of mitigation for impacts to wetlands.

See response to comment 0167-24, above, regarding the project's adherence to wetland avoidance/mitigation sequencing guidelines.

Section 4.15, "Wetlands," analyzes potential effects on wetland resources. This section includes an analysis of cumulative effects. The analysis states that impacts on wetlands and waters resulting from implementation of the Gondola would be permanent, resulting from direct fill of waters of the United States and waters of the state, and temporary, related to activities during construction. Construction activities would be required to comply with existing federal, state, and local regulations and permitting requirements that protect wetland, riparian, and other waters. RPMs BIO-24 through BIO-26, BIO-34 through BIO-36, and BIO-39 would reduce significant impacts on wetlands and waters because they would require that aquatic habitat is avoided to the extent feasible, and that aquatic habitats that cannot be avoided are restored following construction or that, if restoration is infeasible, compensation would be provided in a manner that results in no net loss of these habitats or loss of ecological function. Based on the no net loss standard required by state and federal laws, the project would not have a considerable contribution to the overall adverse cumulative effect on waters and wetlands in the spatial scope of this analysis. This cumulative impact analysis states that there would be impacts to wetlands, and

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that they would be mitigated through both minimization of impacts and the wetlands compensation process.

The "logic" of the Draft EIS/EIR's approach is not circular. The EIS/EIR appropriately acknowledges that applicable laws and regulations would be implemented during project implementation, and then identifies the outcome of compliance with these laws and regulations. Compliance with Section 404 of the Clean Water Act requires that there be no net loss in wetland functions and values. If, at the end of project implementation, there is no net loss of wetland functions and values attributable to the proposed project, then it is logical to conclude that the proposed project would not make a considerable contribution to cumulative wetland impacts. That is, even if under cumulative conditions there has been a significant impact to wetlands resources, project would not contribute further to that cumulative impact.

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Michael D. White, Ph.D.**Michael White Consulting**

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Dr. White is an ecologist with 30 years of professional experience with conservation planning, environmental regulations, and ecosystem assessment, management, and restoration. Has work has required extensive coordination with local government agencies, state and federal wildlife and land management agencies, local academic and research institutions, non-governmental organizations, private and foundation funders, landowners, and the general public.

Dr. White has served as the lead biologist on many high-visibility and multi-stakeholder projects in California. These included developing management and restoration strategies for the Lower Colorado River Multiple Species Conservation Program, developing a reserve design and adaptive management plan for the Tejon Ranch, producing a conservation framework for Las Californias Binational Conservation Initiative, resource management planning for the Sonoran Desert in California, and identifying conservation priorities and forest management strategies for the Sierra Checkerboard Initiative. In these efforts, he has used an objective science-based approach to develop practical land use and conservation outcomes that are trusted by diverse stakeholders.

From 2004-2008, Dr. White was science advisor to the environmental groups that negotiated the Tejon Ranch Conservation and Land Use Agreement, which conserved 90% of the 270,000-acre Tejon Ranch, the largest private property in California. The Agreement created the Tejon Ranch Conservancy to steward its diverse and unique conservation resources. Dr. White served as the Conservancy's first Conservation Science Director from 2009-2017, where he hired and directed staff to develop and implement Science, Stewardship, and Public Access programs; developed partnerships with universities, governmental agencies, and other nonprofits; helped to develop and implement organizational policies and procedures necessary to obtain the Conservancy's accreditation from the Land Trust Alliance; and worked closely with the Executive Director and Board to acquire funding to purchase over 60,000 acres of conservation easements and support the Conservancy's programs. He led public education tours and taught the California Naturalist course for 3 years as part of developing the Conservancy's volunteer program. Working collaboratively with the landowner, Dr. White prepared the first adaptive management plan for Tejon Ranch, and worked with the landowner and its ranching lessees to raise funding to implement elements of the plan.

Dr. White presently a Visiting Scholar at University of California Berkeley Department of Environmental Sciences, Policy and Management, an Adjunct Associate Professor at San Diego State University Department of Biology, and Principal of Michael White Consulting, which advises nonprofit organizations on conservation and management issues.

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EDUCATION

Ph.D. Ecology, San Diego State University and University of California, Davis, 1991.
Dissertation: *Horizontal distribution of pelagic zooplankton in relation to predation gradients.*
B.A. Ecology, Behavior and Evolution, University of California, San Diego, 1982.

PERSONAL

Born July 20, 1960, Los Angeles, California (citizen of U.S.A.).
Married.

PROFESSIONAL ORGANIZATIONS AND AFFILIATIONS

Visiting Scholar, Department of Environmental Sciences, Policy and Management, University of California Berkeley 2017-present
Adjunct Associate Professor, San Diego State University 1991-present
Society for Conservation Biology
Southwest Association of Naturalists
Society for Range Management
Natural Areas Association
California Native Plant Society

EMPLOYMENT HISTORY

August 2017 – present. Principal, Michael White Consulting. Providing environmental consulting services to nonprofit organizations in the areas of habitat and species conservation, land management and monitoring, research facilities siting, and fundraising.

July 2017 – present. Visiting Scholar, University of California Berkeley, Department of Environmental Science, Policy and Management. As a Visiting Scholar, Dr. White is continuing his work with Dr. Bartolome and his lab members developing models for conservation management of rangeland resources in California. Building on years of collaborative field ecology studies of grasslands and riparian systems at Tejon Ranch, Dr. White is working with the lab to synthesize these findings into a deeper understanding of system structure and function and implications for conservation management of rangeland resources in an under-studied part of California.

August 2009 – June 2017. Conservation Science Director of the Tejon Ranch Conservancy. Responsible for developing and implementing research, management, and public access programs for 240,000 acres of Tejon Ranch. Responsibilities included research and monitoring, development and implementation of a Ranch-wide Management Plan for conserved lands, science staff supervision, coordination of research projects, fundraising, and annual planning and budgeting.

July 1999 – July 2009. Senior Ecologist and San Diego Director of the Conservation Biology

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Institute, Encinitas, California. Providing administrative and fiscal oversight of a four-person operation with a budget of approximately \$500K/yr. Responsibilities include annual budgeting, fundraising and proposal preparation, oversight of office contracts, staff timekeeping and project tracking, accounts payable, accounts receivable, project management, and technical studies.

July 1998 – July 1999. Senior Technical Specialist. Ogden Environmental and Energy Services Co., Inc., San Diego, California. Responsibilities included providing technical oversight of the Lower Colorado River Multiple Species Conservation Program project and senior technical support of project staff.

January 1997 – June 1998. Manager, Aquatic Sciences Group. Ogden Environmental and Energy Services Co., Inc., San Diego, California. Managed a group of nine professional aquatic scientists with revenues of approximately \$2M/year. Responsibilities included administration, marketing and proposal preparation, strategic planning, annual budgeting and performance tracking, timekeeping oversight, personnel supervision (including direct supervision of four professional biologists), project management, and project technical support.

January 1994 – December 1996. Deputy Manager, Biological Resources Group, Ogden Environmental and Energy Services Co., Inc., San Diego, California. Deputy Manager for a group of 23 professional biologists. Responsibilities included marketing and proposal preparation, strategic planning, annual budgeting, group health and safety program oversight, personnel supervision (including direct supervision of five professional biologists), project management, and project technical support.

September 1989 – July 1994. Senior Ecologist, Ogden Environmental and Energy Services Co., Inc., San Diego, California. Responsibilities included marketing and proposal preparation, project management, project technical support, and direct supervision of three professional biologists.

September 1983 – December 1990. Graduate Assistant, San Diego State University, San Diego, California.

July 1984 – June 1985. Graduate Assistant, UC Davis Tahoe Research Group, Lake Tahoe City and Davis, California.

SELECTED PROJECT EXPERIENCE

Conservation Science Director – Tejon Ranch Conservancy. As the first Conservation Science Director of the new Conservancy, Dr. White was responsible for creating the Conservancy's science and stewardship programs from scratch. This entailed synthesizing existing information, prioritizing research and monitoring efforts, planning and budgeting, developing funding proposals, coordinating researchers and contractors, interfacing with the landowner, overseeing conservation easement stewardship, and hiring and managing staff. He regularly presents to public, as well as academic and professional audiences on the work of the Conservancy.

One of Dr. White's primary responsibilities at the Conservancy was preparing the first adaptive management plan for the conserved lands at Tejon Ranch (called the Ranch-wide Management

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Plan [RWMP]). The Tejon Ranch Conservation and Land Use Agreement provides for the continued use of lands under easement by the landowner, the Tejon Ranch Company, for commercial ranching, hunting and other compatible uses. Thus, the focus of the RWMP was to maintain, enhance and restore conservation values within a private, working lands context. Working with contractors, academic partners, and citizen scientists, the Conservancy's Science Program has been inventorying the natural resources on Tejon Ranch, elucidating drivers of ecosystem structure and function, and hypothesizing management actions to enhance resource conditions to inform resource management planning. The RWMP defined the Conservancy's rationale and vision for adaptive management at Tejon, and established Best Management Practices (BMPs) for the landowner's land uses to protect and, where feasible, enhance conservation values.

Following adoption of the RWMP in 2013, Dr. White's focus has prioritized and implemented stewardship actions laid out in the plan. These have primarily involved cattle grazing management to achieve conservation objectives in grasslands and riparian and wetland ecosystems across tens of thousands of acres of Tejon Ranch. Grasslands enhancement projects seek to use cattle to reduce the biomass of nonnative Mediterranean grasses to favor native forb species and improve habitat structure for native animals. Riparian and wetland enhancement projects intend to reduce livestock grazing pressure during summer and fall months to enhance diversity, cover and structure of vegetation communities to improve habitat condition and function. These grazing management projects have required installation and reconfiguration of ranching infrastructure (e.g., fences and water systems) to enable the desired conservation grazing management, which has required extensive coordination with the landowner, ranching operators, funding and permitting agencies, and contractors.

Dr. White facilitated an extensive amount of external research at Tejon Ranch, with over 40 research projects started on the property during his tenure. These projects ranged in scope from species inventories, habitat modeling, population dynamics, climate change responses and adaptation, and various geological investigations. Dr. White served on several graduate committees for Tejon-related projects and has overseen several group projects with universities. He developed and coordinated the first Citizen Science projects at Tejon Ranch, co-taught the Conservancy's California Naturalist (Master Naturalist) course to members of the public, and frequently led public tours.

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*REGIONAL HABITAT CONSERVATION PLANNING,
MONITORING, RESTORATION, AND MANAGEMENT*

State Wildlife Action Plan Forest and Rangelands Companion Plan Development Team – California Department of Fish and Wildlife. While with Tejon Ranch Conservancy, served as part of a technical advisory group to the Department and their consultant team during the development of the Forest and Rangelands Companion Plan to California's State Wildlife Action Plan revision in 2016. The role of the advisory group was to help identify conservation issues and strategies pertinent to forest and rangeland ecosystems.

California Landscape Conservation Collaboration Technical Advisory Team. While with Tejon Ranch Conservancy, served on the Technical Advisory Team for the development of a Strategic Plan and Scientific Management Framework for the California LCC. The role of the advisory group was to provide technical input to LCC staff on conservation and adaptive management issues in the planning area.

Yuba Foothills Conservation Assessment – The Trust for Public Land. Dr. White prepared a conservation assessment of a 600,000-acre study area in the northern Sierra Nevada foothills. The purpose of the assessment was to identify meaningful conservation objectives and opportunities and provide a case statement for the study area to guide TPL's land conservation work. As part of the assessment, Dr. White conducted a landscape integrity analysis for the entire northern Sierra Nevada foothills subregion as a way of providing a regional context for the conservation values of the study area.

Effective Conservation and Management of the Sonoran Desert of California – The Nature Conservancy. Working with TNC, CBI evaluated ways of increasing the effectiveness of conservation and management over the 6 million-acre portion of the Sonoran Desert ecological region within California. CBI and TNC made use of the Marxan reserve selection algorithm to identify portions of the study area that support specific conservation values, and then identified how existing land ownership and management patterns protect these conservation values from an array of potential threats, including land conversion, inappropriate recreational activities, mining, alternative energy production, and exotic plant species. The results of this project will be used to guide TNC's conservation activities in the region.

Northstar Habitat Management Plan – Booth Creek. Dr. White provided technical review of the Habitat Management Plan (HMP) developed for the 8,000-acre Northstar at Tahoe ski resort in the Martis Valley, California. Development of the HMP was an obligation of the settlement agreement between Northstar and local environmental organizations for which Dr. White served as a technical expert. The Northstar ski resort supports areas of relatively intact late seral conifer forest supporting species such as California spotted owl, pine martin, and northern goshawk, as well as high quality riparian and aquatic habitats, meadows, and deer fawning habitat. The HMP will be used to guide expansion of the ski resort authorized by the settlement agreement, and forest management measures to enhance late seral forests and other habitats on the property.

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Tejon Ranch Reserve Design. CBI, working with the South Coast Wildlands Project, developed a science-based reserve design for the 270,000-acre Tejon Ranch. The reserve design used a series of conservation planning principles and the results of previous CBI studies conducted for the Ranch to design and justify a reserve that captures regional conservation objectives, such as habitat representation goals, protection of intact watersheds, rare and endangered species protection and recovery, and maintenance of intact core reserve areas. The reserve design underwent peer review by a group of academics, resource agency staff, and local experts. The final reserve design was provided to stakeholders with an interest in significant conservation on Tejon Ranch for use in negotiations with the landowner.

Environmental Monitoring and Habitat Management Planning Program for the Ramona Grasslands – The County of San Diego Department of Parks and Recreation and The Nature Conservancy. Dr. White was the lead scientist for the development of a habitat management plan for the Ramona Grasslands in central San Diego County. The Ramona Grasslands are a regionally important conservation area, supporting a variety of target resources, including vernal pools and rare vernal pool species, Stephens' kangaroo rat, wintering and breeding raptors, riparian habitats and arroyo southwestern toads, and native grasslands. Development of the management plan was preceded by a 2-year baseline field monitoring program that was coordinated by Dr. White. The Ramona Grasslands are grazed by cattle, which maintain habitat suitability for some species but can adversely affect other natural resources. The adaptive management plan proposed a managed grazing strategy to balance these resource needs and optimize habitat quality across the preserve. Monitoring activities proposed by the management plan include surveys of grassland, vernal pool, and riparian plants; characterization of stream channel geomorphology and water quality; and avian, small mammal, amphibian, and fairy shrimp surveys. The management plan built on the science foundation CBI articulated for the Ramona Grasslands in the Framework Management Plan previously developed for The Nature Conservancy.

Hydrologic and Hydraulic Assessment of Santa Maria Creek – The Nature Conservancy. Dr. White was the lead scientist for a project conducted in collaboration with researchers from San Diego State University's Department of Geography. The purpose of the project was to analyze historic, current, and future hydrologic and hydraulic regimes, and associated changes in channel geomorphology and riparian vegetation of Santa Maria Creek, Ramona, San Diego County. The analysis focused on how changes in land uses in the watershed affect runoff quantity, stream discharge and stage, and channel geomorphology and riparian vegetation distribution. Historic land uses were quantified from California Department of Water Resources land use maps and historic channel geomorphology and riparian vegetation distribution from historic aerial photography. Future land use was projected from County of San Diego General Plan information. This information is being incorporated into management planning for the Ramona Grasslands Open Space Preserve, which is traversed by Santa Maria Creek.

Shirrtail Creek Forest Property Conservation Assessment – Endangered Habitats Conservancy and California Wildlife Foundation. Dr. White prepared a conservation assessment to support the acquisition of the 1,000-acre Shirrtail Creek Forest Property outside of Foresthill, California in the northern Sierra Nevada. The assessment characterized the resource values of the property, which included pristine reaches of Shirrtail Creek, oak woodlands, and old-growth conifer forests, special status species supported by the property, and the role of the property

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in regional connectivity.

El Monte Valley Restoration Project – Endangered Habitats Conservancy. Dr. White is directing restoration planning for approximately 450 acres of the San Diego River and its floodplain in the El Monte Valley, Lakeside, California. The riverine functions and values of the site are currently compromised by a lack of surface-water hydrology due to the El Capitan dam upstream of the site, lowered groundwater elevations from groundwater withdrawals, and significant invasion of the river channel by exotic species. The project entails coordinating the design of the restoration project with a groundwater recharge project proposed for the Valley by the Helix Water District. Dr. White coordinated field studies within the project area including vegetation mapping, avian point counts, and establishment of a bird banding (MAPS) station.

Conservation Assessment of Rancho Guejito. CBI prepared a conservation assessment for the 20,000-acre Rancho Guejito in northern San Diego County, one of the most important conservation targets in the region. The assessment documents the conservation significance of Rancho Guejito from both a natural and cultural resources perspective. The assessment evaluated the resources of Rancho Guejito within a Southern California regional context, and assessed its potential contribution to conservation of landscape-scale processes, protecting intact watershed basins, under-protected vegetation associations, and key sensitive species, as well as prehistoric and historic cultural resources. The assessment is being used by conservation organizations to justify and develop strategies for conservation of the property.

Las Californias Binational Conservation Initiative – San Diego Foundation and Resources Legacy Fund Foundation. In partnership with the Mexican non-governmental organization, *Pronatura*, and The Nature Conservancy, CBI designed a conservation reserve for a 2.5 million-acre area of Southern California and northern Baja California. The study area extends from the Sweetwater River watershed in California to the Rio Guadalupe watershed in Baja California. The project used the reserve selection algorithm, *SPOT*, to select a reserve portfolio. The project has required extensive manipulation and merging of various U.S. and Mexican digital datasets (e.g., land cover, roads, digital elevation models, etc.) and cross-walking of different vegetation classification systems. Conservation achievements within the Las Californias Binational Conservation Initiative study area total over 3,500 acres to date, and are currently a priority of local, state, and federal governmental agencies and non-governmental conservation organizations.

Sierra Nevada Checkerboard Initiative – The Trust for Public Land. Ownership in the Central Sierra Nevada is characterized by a “checkerboard” pattern of public and private land, which potentially complicates management of the landscape for conservation, recreational, and timber harvest values. The Trust for Public Land’s Sierra Checkerboard Initiative attempts to affect changes in ownership and management patterns in the northern Sierra to ameliorate the conflicts caused by the checkerboard ownership. Dr. White, working with TPL and its conservation partners, Sierra Nevada Forest Protection Campaign and California Wilderness Coalition, first conducted a science assessment of the 1.5-million acre Sierra Checkerboard Initiative study area to identify high resource value areas, threats to these resources, and spatially explicit management strategies that could be implemented by TPL and its partners to improve resource values. As part of the assessment, Dr. White assembled and worked with a Scientific Advisory Panel of academics and resource agency staff with relevant experience in the Sierra Nevada to advise and review our

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work on the project. Working with TPL's forestry consultant, Dr. White then prepared a conservation strategy that identified priority areas for conservation actions and available private lands conservation approaches. TPL is currently implementing the conservation vision developed for the Initiative.

Tejon Ranch Conservation Assessments – Environment Now and Resources Legacy Fund Foundation. Dr. White was the lead scientist for two assessments characterizing the conservation value of the 270,000-acre Tejon Ranch, California. The Conservation Significance Project was conducted in partnership with the South Coast Wildlands Project and California Wilderness Coalition. The Conservation Significance Project made use of available data, museum records, and expert opinion and assessed the biogeographic importance of the Tejon Ranch, its core habitat and natural community representation values, roadlessness, terrestrial and watershed integrity, importance as a habitat linkage, and habitat for rare and endangered species. CBI also conducted an additional Conservation Assessment Project that identified the distribution of a set of conservation values across Tejon Ranch. Conservation values included threatened, endangered and endemic species distributions, roadless areas analysis, watershed integrity analysis, habitat diversity, and regionally under-protected vegetation communities. As part of the Conservation Assessment Project, CBI conducted a remote sensing analysis to update information on roads, land cover, and vegetation community distributions.

South Coast Missing Linkages Project – South Coast Wildlands Project. Dr. White participated in partnership with the South Coast Wildlands Project, The Nature Conservancy, and Pronatura to conduct planning studies on five important habitat linkages in the U.S.-Mexico border region. The CBI is took the lead on two of the five linkages. One was linking National Forest land in the Laguna Mountains with important habitats in Baja California through the Campo Valley area of San Diego County. The other was linking habitats in the Jacumba Mountains with those in the Sierra Juarez in Baja California.

Habitat Management Planning for the Lake Hodges/San Pasqual Valley MSCP Preserve Area – City of San Diego. Dr. White developed a habitat management plan for the over 9,000-acres Lake Hodges/San Pasqual Valley MSCP Preserve Area. He coordinated a team of specialists comprised of local biologists, the U.S. Geological Survey, and San Diego State University to conduct baseline field surveys and map the distributions of key resources, including vegetation communities, rare plants, Hermes Copper butterfly, herpetofauna (including the endangered arroyo southwestern toad), and breeding riparian birds (including the endangered least Bell's vireo and southwestern willow flycatcher). The management plan addressed issues such as control of adjacent land use impacts, fire management, recreational access, fencing, exotic species control, monitoring, and research.

Monitoring Program for the Santa Margarita River – The Nature Conservancy. Dr. White developed a program to monitor future potential changes in the Santa Margarita River associated with modification of base flows resulting from a water rights settlement on the river. Base flow augmentation resulting from the settlement has been designed to mimic natural discharge patterns historically observed in the river. The objective of the monitoring program was to quantify conditions prior to the modification of base flows and to track changes following base flow augmentation. The monitoring plan was structured around distinct reaches of the river that are

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anticipated to respond similarly to river hydrology. Elements considered in the monitoring plan include biological resources (riparian and coastal stream communities), water quality, discharge, and channel geomorphology.

Regional Conservation Planning and Constraints Analyses for Eastern San Diego Mountains – The Nature Conservancy. CBI worked with The Nature Conservancy and a team of regional scientific experts to prioritize conservation opportunities for a 400,000-acre area in San Diego County that includes the headwaters of five major watersheds. The study involved development and review of a spatial and non-spatial database for the area, identification of regionally important resources and landscape connections, and a gap analysis to identify regionally important resources that were in private ownership and zoned for development or agriculture. CBI identified and evaluated the potential effects of land uses and other stressors, including those that may affect downstream portions of the watersheds. CBI and a team of scientists conducted biological surveys of selected properties. As a result of the studies, CBI prepared a conservation strategy report that identifies conservation priorities, research needs, land use constraints, potentially compatible land uses and appropriate locations, restoration opportunities, and habitat management goals.

MSCP Monitoring Program Coordination – California Department of Fish and Game (CDFG), U.S. Fish and Wildlife Service (USFWS) and City of San Diego. CBI worked with the City of San Diego and other San Diego County jurisdictions, USFWS, and CDFG to implement the Subregional Biological Monitoring Program for the San Diego MSCP. As part of this effort, CBI compiled an inventory of existing monitoring efforts in western San Diego County, developed a strategic framework of the roles and responsibilities of the monitoring partners, refined biological monitoring protocols, developed structures and protocols for managing large biological databases, formulated a strategy for developing a centralized database repository, and developed a web site to disseminate MSCP-related information to the public.

Regional Biological Monitoring Plan for the Multiple Habitats Conservation Program – San Diego Association of Governments. In coordination with the California Department of Fish and Game and the U.S. Fish and Wildlife Service, and the seven North San Diego County cities participating in the Multiple Habitats Conservation Program (MHCP), CBI developed a regional biological monitoring plan for the MHCP planning area. The MHCP biological monitoring program is intended to provide a systematic data collection effort to gauge the progress and success of the habitat preserve system. The plan addresses regional monitoring objectives and describes specific monitoring approaches for riparian communities, uplands, vernal pools, coastal lagoons, and wildlife movement corridors within the preserve system.

Habitat Management Planning for the Marron Valley Preserve Area – City of San Diego. Dr. White developed a habitat management plan for the 2,600-acre Marron Valley MSCP Preserve Area. He coordinated a team of biologists associated with CBI, the U.S. Geological Survey, and the San Diego Natural History Museum to conduct baseline field surveys and map the distributions of key resources, including vegetation communities, rare plants, endangered Quino checkerspot butterflies, herpetofauna (including the endangered arroyo southwestern toad), and breeding riparian birds (including the endangered least Bell's vireo and southwestern willow flycatcher). Dr. White conducted surveys for the endangered San Diego fairy shrimp in vernal pools on the property. The management plan addressed issues such as cattle grazing, fire management, access,

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fencing, exotic species control, monitoring, and research.

Wildlife Corridor Monitoring Study – City of Poway and City of San Diego. This study evaluated the use of designated wildlife corridors by target mammal species, including mountain lions, bobcats, coyotes, mule deer. Field monitoring was conducted in the Los Peñasquitos, Carmel Valley, Carmel Mountain/Del Mar Mesa, and eastern Poway areas by a graduate student and by a local volunteer organization using different methodologies over several seasons. Dr. White analyzed the data generated to assess the functionality of the wildlife corridors and to compare the methods. CBI's report made recommendations on wildlife corridor monitoring methodologies for the MSCP.

Lower Colorado River Multi-Species Conservation Program – National Fish and Wildlife Foundation. Dr. White served as the Technical Coordinator of the plan development team for the Lower Colorado River Multiple Species Conservation Program (LCR MSCP). The LCR MSCP plan was prepared for a consortium of federal and state agencies (California, Nevada, and Arizona), water and hydropower interests, and Native American Tribal governments. The LCR MSCP was initiated to optimize opportunities for current and future water and power development in the lower Colorado River basin, while working towards conservation of listed and selected unlisted species and their habitats in compliance with both the federal and California Endangered Species Acts. The result of the plan will be the issuance of incidental take authorizations under Sections 7 and 10(a)(1)(B) of the Endangered Species Act, and Section 2835 of the California Natural Communities Conservation Program Act for those species deemed to be adequately addressed by the plan, through a combination of conservation, management, restoration, and operational measures.

Dr. White's responsibilities included providing overall technical oversight for the project team, including development of a conservation strategy for the program and alternatives for evaluation under the California Environmental Quality Act and National Environmental Policy Act. The conservation strategy involved a strong riparian habitat restoration component, which involves integrating the requirements of riparian species with the hydrologic and hydraulic conditions on the river in light of future water management scenarios (e.g., intrastate water transfers to achieve compliance with California's 4.4 Plan, offstream storage and interstate transfer rules). The conservation strategy had to consider large-scale water management activities and water accounting practices dictated by the large body of legislation and court decrees collectively known as the Law of the River.

Multiple Species Conservation Program – City of San Diego Clean Water Program. Dr. White participated in development of a conservation and management plan for federally listed species and key candidate species and their habitats in a 900-square-mile area in San Diego County. He coordinated the development of a GIS-based habitat evaluation model, prepared hydrologic management guidelines for the preserve system, and assisted with development of the species and habitat monitoring program for the preserve system.

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TECHNICAL STUDIES

Fairy Shrimp Survey Protocol Analysis – Western Riverside County Regional Conservation Authority. Dr. White performed an analysis of Endangered Species Act section 10(a)(1)(A) fairy shrimp survey data to assess the adequacy of a single survey, as opposed to multiple surveys, in detecting fairy shrimp in vernal pools. The analysis used the survey data to determine the conditional probability of detecting shrimp in the second survey period if shrimp either were or were not collected in the first survey period.

The Influence of Watershed Urbanization on the Hydrology and Biology of Los Peñasquitos Creek – The San Diego Foundation Blasker Rose-Miah Fund. Dr. White was awarded a research grant to study the effects of urbanization in the Los Peñasquitos Creek watershed. The Los Peñasquitos Creek watershed is a small coastal watershed in San Diego, California that contains significant areas of conserved natural habitats, but has experienced rapid urban growth. The study examined how patterns of land use change in the Los Peñasquitos Creek watershed have affected downstream hydrology of the creek, channel geomorphology, and associated riparian vegetation communities. The research showed that urbanization of the watershed has resulted in significant increases in discharge, annual runoff, flood peaks, and dry-season flows. These hydrologic changes have driven changes in the distribution and composition of riparian habitats associated with Los Peñasquitos Creek.

Source Water Protection Guidelines – The City of San Diego Water Department. Dr. White provided technical assistance to City of San Diego Water Department staff in preparing development guidelines intended to ensure protect of the quality of San Diego source water supply reservoirs. The project was conducted by a consulting firm, Brown and Caldwell, and Dr. White served as a technical advisor directly to the City.

Guajome Lake Water Quality Assessment Project – County of San Diego. Dr. White served as project manager for a water quality study at Guajome Lake in northern San Diego County funded under the U.S. Environmental Protection Agency's (USEPA) Clean Lakes Program. The focus of the project was to characterize water quality in the lake through field sampling and chemical analysis of soil, sediment, stream flow, and lake water to identify pollution problems in the lake and its watershed. The project included preparation of a Quality Assurance Project Plan (QAPP), assessing historic uses of agricultural chemicals in the watershed, estimating sediment and chemical constituent loadings to the lake with watershed modeling techniques, developing and assessing pollution control measures, and developing pollution control and water quality monitoring programs for the lake.

San Diego River Live Stream Discharge Studies – City of San Diego. Dr. White was biology task manager for analysis of potential effects of live stream discharge of reclaimed water to the San Diego River. The objectives of the study were to determine the feasibility of a live stream discharge program in light of the potential effects to wetlands (including habitat for the endangered least Bell's vireo), aquatic fauna, water quality, and public health. Responsibilities included an assessment of the effects of varying quantities of live stream discharge on fisheries habitat, riparian and salt marsh wetlands, wetland-associated terrestrial species, and disease vectors. Completion of this task required interpretation of the QUAL2E water quality model output and hydraulic

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modeling output.

Salton Sea Water Quality Management Project – Salton Sea Authority. As project manager for a program funded under a USEPA Clean Lakes Grant, Dr. White summarized and presented environmental and economic analyses of salinity and surface elevation management alternatives at the Salton Sea. The project entailed interaction with the USEPA, U.S. Army Corps of Engineers, Bureau of Reclamation, U.S. Fish and Wildlife Service, California Department of Fish and Game, Regional Water Quality Control Board, California Environmental Protection Agency, and local citizens groups to identify and summarize their concerns.

Olivenhain Reservoir Limnological Assessment – Olivenhain Water District. Dr. White served as project manager and technical lead for the assessment of anticipated limnological conditions of a reservoir planned for San Diego County (Olivenhain Reservoir). The assessment projected anticipated thermal stratification and dynamics of nutrients, dissolved oxygen, and other water quality constituents. He recommended design features to better manage water quality in the reservoir, including a multi-port outlet tower to allow selective withdrawals, artificial circulation/hypolimnetic aeration, and a separate inlet structure for aqueduct inflows.

Fairy Shrimp Survey and Assessments – Twentynine Palms Marine Corps Air Ground Combat Center. Dr. White directed field surveys of anostracans (primarily fairy shrimp) in desert playas and impact assessments of base operations on these resources. Field surveys involved collecting samples of sediments containing anostracan eggs that were reared in controlled conditions in the laboratory. The impact assessment primarily evaluated the effects of vehicle traffic (e.g., tanks and armored personnel carriers) on desert playa habitats.

Fisheries Survey – Newhall Land and Farming. Dr. White conducted a field survey of native fishes in the Santa Clara River, Los Angeles County, California, as part of an emergency road crossing project. The purpose of the survey was to document the species present in the study area and to relocate fish potentially impacted by construction operations to areas outside of the impact zone as conditioned in the California Department of Fish and Game Streambed Alteration Agreement for the project. Species of particular interest were three-spined stickleback (*Gasterosteus aculeatus*), arroyo chub (*Gila orcutti*), and Santa Ana sucker (*Catostomus santaanae*).

Impacts of Threadfin Shad on Largemouth Bass – San Diego State University. Dr. White participated in a project to examine the impacts of threadfin shad introductions on aquatic biota in Southern California reservoirs. He sampled fish and plankton, conducted physical and chemical analyses, and conducted echo-sounding in six lakes in San Diego County. Dr. White identified zooplankton and provided statistical review.

Impacts of Opossum Shrimp on Zooplankton – Tahoe Research Group. Dr. White participated in a project assessing the impacts of opossum shrimp (*Mysis relicta*) introductions on Lake Tahoe zooplankton. He installed experimental enclosures with scuba, sampled and counted zooplankton, and performed a variety of routine limnological analyses, as well as conducted short-term opossum shrimp feeding experiments.

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ANALYSIS OF ENVIRONMENTAL IMPACT
AND REGULATORY COMPLIANCE

Martis Valley Community Plan – Sierra Watch and Mountain Area Protection Foundation. Dr. White conducted a review and provided comments on the Environmental Impact Report prepared for the update to the Martis Valley Community Plan on behalf of Sierra Watch and Mountain Area Protection Foundation. The Community Plan Update proposed alternatives that would change development patterns in the Martis Valley Community Planning Area, Placer County, California. These impacts would have potentially significant impacts to high value terrestrial and aquatic resources, including forests, shrub communities, meadows, and stream systems. To assist with critiquing the biological resources analyses in the EIR, CBI developed a natural resources conservation vision for the Martis Valley and identified how the proposed developments authorized under the proposed Community Plan would adversely affect these resources. Dr. White participated in landowner negotiations over development designs and provided litigation support.

Evaluation of the Cabo San Quintín Development Project and Environmental Impact Study – *pro esteros* and Endangered Habitats League. CBI conducted an evaluation of the proposed Cabo San Quintín development plan and associated Mexican environmental impact study (Manifestación de Impacto Ambiental) for the Punto Mazo peninsula, San Quintín, Baja California, Mexico. The evaluation discussed inadequacies and inconsistencies of the environmental analysis, and presented an independent analysis of key project features and their potential impacts. Key points discussed in the evaluation included the inadequate consideration of Mexican endangered species laws, state land use regulations, potable and irrigation water supply issues, waste water treatment and potential nutrient loading, potential effects of marina dredging on the Bahía San Quintín, potential impacts to endemic species and sensitive habitats, and potential socioeconomic impacts associated with the increased regional infrastructure and services needs that would result from implementing the project.

Wetlands Permitting, Mission Valley West Light Rail Transit – Metropolitan Transit Development Board. Dr. White was the project manager responsible for coordinating wetlands and endangered species permitting for the Mission Valley West Light Rail Transit project. He conducted a Section 404(b)(1) alternatives analysis, selected potential riparian mitigation sites, acted as permitting agency liaison, coordinated development of a wetlands mitigation plan, conducted U.S. Army Corps of Engineers 404 and California Department of Fish and Game Streambed Alteration Agreement permitting, and coordinated Section 7 consultation for the endangered least Bell's vireo.

Wetlands Permitting and Mitigation Plan, East Mission Gorge Sewer Interceptor Force Main and Pump Station – City of San Diego Water Utilities Department. Dr. White coordinated the development of a detailed wetlands mitigation plan for impacts associated with the construction of a sewage pump station and force main. The wetlands mitigation plan was developed in consultation with the U.S. Fish and Wildlife Service, California Department of Fish and Game, and City of San Diego. The mitigation plan was required for the U.S. Army Corps of Engineers' Section 404 and California Department of Fish and Game 1601 permitting process. Dr. White also conducted the biological resources impact analysis for the California Environmental

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Quality Act (CEQA) compliance.

CONSERVATION OUTREACH, TRAINING, AND EDUCATION

San Dieguito River Watershed Information System – San Dieguito River Valley Conservancy. Dr. White directed the development of a Geographic Information System (GIS) based information system that will assist the Conservancy and the San Dieguito River Valley Joint Powers Authority (JPA) with planning, land acquisition and conservation, and community outreach. The project was funded by the San Diego Foundation. The GIS tool combines available regional data layers such as land use, land ownership, biological resources information, topography, water resources information, and political boundaries, into a user-friendly mapping and analysis tool. The tool allows staff at the Conservancy and JPA to combine various data layers for environmental analyses, to track resource and land status in the watershed, and to create maps and displays for outreach purposes.

Conservation Resource Center Feasibility Study – San Dieguito River Valley Conservancy. CBI prepared a study evaluating the feasibility and desirability of establishing a resource support service for conservation groups in San Diego County. The first phase of the study included an exploratory workshop and discussions with individuals from the San Diego conservation community about alternative strategies for sharing resources. CBI conducted research on other organizational models across the country and evaluated the local availability of technical services. We prepared a report summarizing the results of our study and that provided recommendations on a structure and strategy for developing a resource center.

Aquatic Ecology Training Program – Campo Environmental Protection Agency. Dr. White conducted training of tribal members working for the Campo Band of Mission Indians Environmental Protection Agency (Campo EPA) in aquatic and riparian resource ecology, inventory, and restoration. The program was funded under Section 106 of the Clean Water Act. The ultimate goal of the program was to provide tribal members sufficient training to allow for an efficient and effective transition of delegation of authority over water resources matters to the Campo Band. He conducted training in riparian ecology, aquatic invertebrate ecology, Rapid Bioassessment Protocols, and stream and riparian restoration techniques.

ECOLOGICAL RISK ASSESSMENTS

Ecological Risk Assessment, U.S. Naval Activities (NAVACTS), Guam – U.S. Navy. Dr. White coordinated investigations in support of ecological risk assessments for terrestrial and freshwater habitats at four sites at NAVACTS Guam. Field studies included mapping and characterization of vegetation and wildlife habitat, floral and faunal inventories, collection of soils and sediments for toxicity tests and chemical analyses, and analysis of resident biota for contaminant bioaccumulation. This information was compared to data from offsite reference areas. These data were used to develop preliminary ecological risk assessments evaluating the potential risk that the chemicals onsite posed to aquatic and terrestrial communities. Of special concern was the potential for adverse impacts to the endangered Mariana common moorhen, which utilizes freshwater marshes in the area. Chemicals of concern for these sites included metals, pesticides, polychlorinated biphenyls (PCBs), dioxins, petroleum hydrocarbons, and polynuclear

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aromatic hydrocarbons (PAHs).

Ecological Risk Assessment, Old WESTPAC Site, NAVACTS, Guam – U.S. Navy. Dr. White coordinated field studies at NAVACTS, Guam to sample soils and freshwater sediments for chemical analyses and toxicity tests. Collected aquatic and terrestrial organisms for tissue analyses to determine bioaccumulation of chemicals found onsite. These data were used to develop a preliminary ecological risk assessment evaluating the potential risk that the chemicals onsite posed to aquatic and terrestrial communities. Of particular concern were wetlands supporting the endangered Mariana common moorhen. Chemicals of concern included metals, pesticides, PCBs, petroleum hydrocarbons, and PAHs.

Ecological Risk Assessment RCRA Facilities Investigation – Rocketdyne Division, Boeing North American. Dr. White oversaw the development of ecological risk assessments at 36 sites at the 2,500-acre Santa Susana Field Laboratory (SSFL) for the Rocketdyne Division of Boeing North American. He supervised biologists conducting extensive field surveys of the SSFL that involved vegetation community mapping, rare plant surveys, and wildlife species inventories. He coordinated with the California Department of Toxic Substances Control (DTSC) on development of a series of “white papers” describing the approach and methodologies that will ultimately be employed to conduct the risk assessments for the SSFL. The white papers dealt with issues such as determining background concentrations, selecting contaminants of concern, proposed conceptual site models, calculation of exposure point concentrations, development of exposure model parameters, and risk-based decision criteria.

PUBLICATIONS AND PRESENTATIONS

PUBLICATIONS AND REPORTS

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0175

0175-1

Squaw Valley Alpine Meadows (SVAM) is submitting these comments in order to provide the County and USFS with information that may be useful in responding to concerns regarding the proposed Gazex system, to be installed along with the B2B Gondola.

The Draft EIS/EIR concludes that the Gazex system will not have a significant impact with respect to noise. The Draft EIS/EIR reaches this conclusion because the amount of noise generated by the Gazex system would be indistinguishable from the noise generated by existing 105mm Howitzer avalanche control measure. Thus, the new system will not result in a noticeable increase in noise levels, as compared to existing conditions.

During the Planning Commission's hearing on the Draft EIS/EIR, a number of commenters expressed concern that the Gazex system may generate noise levels that are disturbing to residents in the area. In responding to these comments, SVAM believes it is important to draw a distinction between the existing Gazex system, and the system that is proposed to be installed as part of the B2B. In particular, the responses should reflect the fact that these concerns are focused on the existing Gazex system, not on the Gazex system to be installed along with the B2B Gondola.

To the extent residents have concerns about the existing Gazex system, we will work with the County to address those concerns. We are as interested in the County in minimizing the extent to which residents are disturbed by the Gazex system installed to protect Alpine Meadows Road. We need to ensure, however, that in addressing those concerns, the system provides adequate avalanche protection in a safe and reliable manner. As both the County and USFS recognizes, avalanche protection is a necessity in this area. If that protection is not provided by the Gazex system, it will have to be provided by other means. Residents recognize this fact, as avalanche protection has been a feature of life in this area for decades. Any other approach to avalanche protection involves trade-offs in terms of noise, safety and reliability. In responding to these comments, the County and USFS should acknowledge these trade-offs.

The responses must also differentiate between the impacts of the existing Gazex system and the Gazex system proposed as part of the B2B Gondola. The existing system is in a different location and much closer to residents and Alpine Meadows Road. Indeed, the existing system is designed to provide avalanche protection to these residents and the road. The B2B system, by contrast, is designed to provide avalanche protection to an area that will be traversed by skiers at Alpine Meadows. This location is more distant and at a different elevation than the existing system.

We want to ensure that, in responding to these comments, the Final EIS/EIR:

- (1) Takes care to distinguish between the current/existing use of Gazex and the proposed B2B gondola future use;
- (2) Recognizes that, before SVAM installed the existing Gazex system, SVAM used howitzers and hand charges to provide avalanche control for Alpine Meadows Road and nearby residences;
- (3) Recognizes that adding additional Gazex facilities does not mean that impacts will necessarily be additive, but are instead dependent on the location, elevation and timing of their use;
- (4) Acknowledges that avalanche control for Alpine Meadows Road and nearby residents is a longstanding program undertaken by both SVAM and the County, and that this program will have to continue to be implemented going forward regardless of whether Gazex facilities are approved at the B2B Gondola location; and

0175-1, Other (O2)

The comment provides additional information from the project applicant regarding existing and proposed Gazex avalanche mitigation facilities. A proposed Gazex avalanche mitigation system was included as part of all Gondola action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, and submittal of this comment letter, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Although the Forest Service and County appreciate the additional information provided in this comment letter, it is no longer relevant with removal of the Gazex mitigation system from the action alternatives.

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0175-1 cont'd, Other (O2)

- (5) Acknowledges the trade-offs associated with Gazex versus other forms of avalanche control – particularly the benefits of the Gazex system in terms of flexibility, reliability and public safety.

Based on comments at the Commission hearing, we recognize that some residents find the existing Gazex system to be intrusive. We are very interested in working with these residents and the County to make sure that the Gazex system is as unobtrusive as possible, while still ensuring that the system provides the public safety benefits upon which we all rely. We are working with Gazex's manufacturer and others to better understand and address these concerns.

We are also concerned, however, that the existing Gazex system is becoming bound up with the B2B Gondola proposal. In particular, there seems to be a misapprehension that the existing Gazex system has been put into place solely as a result of the B2B Gondola. That is incorrect. The B2B Gondola does include a proposal to install Gazex facilities on skiable terrain located in the vicinity of the B2B Alpine Meadows mid-station. But this proposal is not tied in any way to the existing Gazex facilities. In order to reduce confusion on this matter, we believe it is essential that the responses make this distinction as clear as possible.

Our objective in seeking greater clarity is to avoid the necessity of an obscure math exercise that treats all Gazex facilities as additive. That is not the way the systems work. Gazex is widely used as a means of avalanche control. It has clear advantages over traditional methods such as hand charges and howitzers. We want to ensure that the County does not over-react to complaints by labelling all Gazex operations as adverse, without regard to their location or use, particularly where as here the system provides significant public benefits. In particular, we want to make sure that the residents' concerns about the existing Gazex system do not result in imposing inappropriate restrictions on the use of Gazex elsewhere at the resort – particularly at the Squaw to Alpine Base-to-Base project.

Background

There is a long history and a current executed agreement in place where Squaw Valley Alpine Meadows (SVAM) provides avalanche control for Placer County for Alpine Meadows Road. SVAM currently has County approval for the installation of 8 Gazex facilities. Four of these facilities are installed and operating. Four additional facilities are under construction and will commence operations in 2019/2020.

The existing system is designed to provide avalanche protection along Alpine Meadows Road and at residences located near this road. The facilities are operated for the exclusive benefit of Alpine Meadows and the public right-of-way and provide no broader resort benefit.

This proven technology is widely used in Europe. It provides the safest and most effective means of avalanche control. In this case for the resort operations team, the system provides avalanche protection for residents living in Alpine Meadows and the public who drive on Alpine Meadows Road.

There is a current agreement in place between the County and Squaw where the County pays the direct costs for SVAM acting as contractor for Placer County to provide this avalanche control to ensure public safety for Alpine Meadows residents and Alpine Meadows Road.

The system provides greater operational flexibility than conventional forms of avalanche control. In particular, the system can be operated at any time avalanche control is needed, whereas conventional forms of avalanche control can be used only when personnel can safely access the area. The

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0175-1 cont'd, Other (O2)

conventional approach means that an avalanche hazard may exist for a period of time, waiting for areas to be safe and/or accessible to personnel. The Gazex system eliminates this risk. In addition, the system does not present a hazard to those operating the system, whereas the use of conventional explosives presents an unavoidable risk to those handling the explosives.

Treating All Gazex Installations Equally

Comments suggest that there is confusion regarding the relationship between the existing Gazex system, and the system proposed to be installed as part of the B2B Gondola. Although the technology is the same, the facilities are separate, and serve different purposes.

The existing system provides avalanche protection for Alpine Meadows Road and adjacent residences. The system has been operated for some time, and will continue to be operated. That will occur regardless of whether the County approves the Gazex system for the B2B Gondola.

The B2B Gondola Gazex system serves terrain that is accessed by skiers at Alpine Meadows. SVAM currently provides avalanche control in this area with howitzers and hand charges. The Gazex system will supplant these conventional avalanche control techniques. If the County does not approve the Gazex system, then SVAM will continue to use conventional techniques for avalanche control in this area. Whether and how avalanche control is provided in this area is unrelated to the existing Gazex system. They serve different purposes.

The County's responses to public concerns should make clear that the systems are in different locations, and provide avalanche control for different areas. Responses should identify the distance between these two areas, in terms of lateral and vertical distance, and should note any intervening topography. That is particularly important because distance and sight lines have a bearing on the extent to which impacts are "additive."

Public Confusion

Public comments at the Planning Commission Hearing on May 24, 2018 were a clear indication that the public was confused. One person asked: "How could the 4 Gazex facilities already in operation have been approved ahead of the B2B project approval?" The County should make clear that the existing system was installed to replace existing avalanche control along Alpine Meadows Road, and note that this system was not installed as part of the B2B Gondola proposal.

Public Safety Risk Mitigation By Separate County Agreement

The current agreement between SVAM and Placer County on avalanche control for Alpine Meadows Road should be described, and distinguished from B2B Gazex avalanche control. SVAM performs as a contractor for Placer County to provide avalanche control for Alpine Meadows Road and the public right-of-way, along with residents located along this right-of-way. This operation is completely independent from the B2B project. The use of these facilities operates solely for the protection of Alpine Meadows Road and surrounding public right-of-way based on the snow conditions in this area. Whether to continue this operation, or to go back to conventional avalanche control techniques, is an issue that should be addressed without regard to the B2B Gondola proposal. In our view, such a decision would significantly increase public safety risk. The essential point, however, is that this decision should not be bound up with the County's decision on the B2B Gondola.

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0175-1 cont'd, Other (O2)

While we understand the County has an obligation to address cumulative impacts, we are skeptical about claims that the B2B Gondola Gazex system will result in cumulative impacts when considered in combination with the existing Gazex system. It may not be accurate to assume that, simply because a Gazex system will be installed in a similar location, the impacts will be additive. The systems will be separated by distance and topography, and may be operated at different times, and in different ways. The need for avalanche control in one area may not coincide with the need for avalanche control in the other. Avalanche control is already being performed in both areas, and that will continue, regardless of the decisions the County makes about the B2B Gondola. We understand why commenters may assume that more Gazex facilities translate into more noise. This assumption is overly simplistic.

We are therefore concerned that any attempt to estimate the cumulative effect of both systems does not rely on arcane models that have little bearing on reality, and only serve to provide a false sense of scientific certainty. In fact, whether and how each system is operated will be determined by conditions at each location. Given the vagaries of mother nature, and the different avalanche control concerns at each location, the variables are endless. That is particularly true where, as here, the issue is not avalanche control versus no avalanche control. Rather, the issue is Gazex versus conventional control. We are not sure whether an exploration of these innumerable variables will provide meaningful information.

Weighing the public benefit

We should not lose sight that these facilities save lives. Even those few who are objecting would likely prefer to be awakened at night if it means reducing the risks associated with an avalanche that isn't triggered until morning. It would be unfortunate to treat these life-saving facilities as creating adverse impacts. If this simple evaluation assumes 16 facilities are more adverse than 8, we do not think it would be responsible to discontinue the Alpine Meadows Road avalanche control facilities and put the public safety at greater risk. However, we believe it is equally inappropriate to assign impacts of 16 Gazex facilities operating simultaneously in proximity to one another (cumulative) to the B2B Gondola.

We are not indifferent to the comments we heard from residents on May 24. If there are ways we can operate the existing Gazex system, so that it is less disturbing to commenters, we are open to working with the County to explore them. We want to make sure that, in any event, we continue our collaboration with the County to provide avalanche control to those traveling on the Alpine Meadows Road public right of way, along with nearby residents. We also want to provide this control in a manner that minimizes risks to our own personnel, and that is both reliable and flexible.

We are also open to suggestions regarding how the Gazex system proposed as part of the B2B Gondola might be operated to minimize disturbance on residents. Given that avalanche control in this area is aimed at protecting skiers, there may be more flexibility in terms of hours of operation than at the existing Gazex system (which protects a public right-of-way and residences).

We appreciate the opportunity to provide these comments.

0176

**Squaw Valley Lodge Owners Association
201 Squaw Peak Road
Post Office Box 2364
Olympic Valley, California 96146**

0176-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

June 5, 2018

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Attention: Shirlee Herrington, Environmental Coordination Services

cdraecs@placer.ca.gov

Subject: SVLOA Comments on Squaw Valley/Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR (State Clearinghouse No. 2016042066)

Dear Ms. Herrington:

Thank you for the opportunity to comment on the Draft EIS/EIR for the Squaw Valley/Alpine Meadows Base-to-Base Gondola Project. This letter is submitted on behalf of the Squaw Valley Lodge Owners Association.

0176-1

The Squaw Valley Lodge (SVL) is 218 unit condominium lodge which is adjacent to the proposed Squaw Valley base terminal in Alternatives #2 and #3 of the Base to Base Gondola. More than 60 units have views to the South and the proposed terminal location area. The closest units are in the range of 60+/- feet from the proposed terminal deck and loading areas. While the SVL HOA supports the concept of an interconnecting gondola as proposed in Alternative #4, the direct proximity of the SVL to the Squaw Valley terminal, as proposed in Alternatives #2 and #3, raise impact concerns for the SVL homeowners and the public at large, which are addressed here.

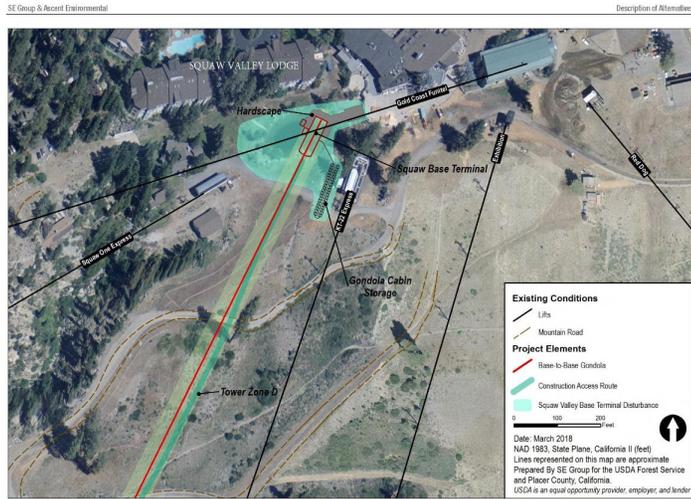
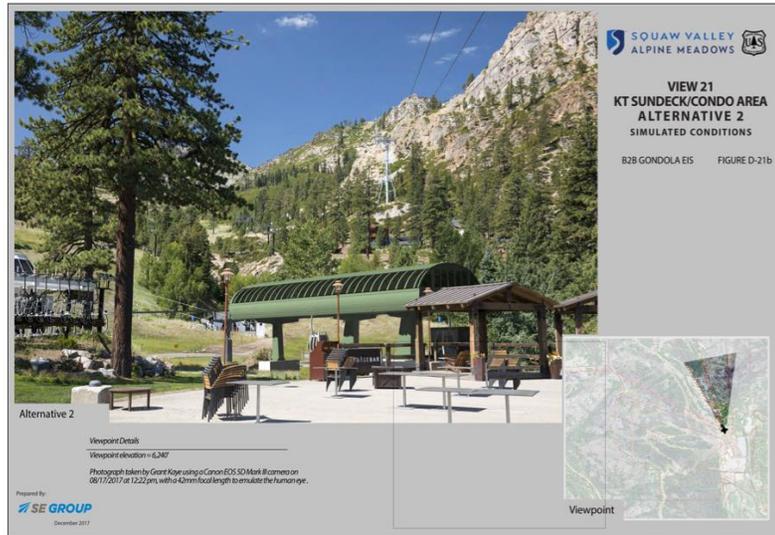


Exhibit 2-6 Close-up of Squaw Valley Base Terminal under Alternatives 2 and 3, along with Tower Zone D

U.S. Forest Service and Placer County
 Squaw Valley | Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR

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PLAN VIEW/AESTHETIC IMPACTS

- 0176-2 • The plan view is very small scale and approximate. That makes it hard for the public to adequately assess the impact of this structure and its effect on the visual character of the site and its surroundings. A scaled plan showing size and relationship to adjacent residential/guest structures and property lines should be included.
- 0176-3 • Alternatives 2 and 3 would result in direct loss (through permanent fill) of 0.25 acre of Cushing Pond. Cushing Pond is a primary visual feature of the site, and enhances the aesthetics of the surrounding area. The removal of a quarter acre of the pond has the potential for significant aesthetic impacts that have not been evaluated or mitigated. The extent and design treatment of Cushing Pond fill and enlargement (in the case of Alternate #2) should be illustrated and included. "Disturbed area" gives little indication, beyond general location, to the public what the proposed terminal/pond implementation will be.
- 0176-4 • "Hardscape" should be defined and illustrated, as the grades in the area are significantly different at the KT deck and the gondola terminal location. As previously explained and illustrated in the visualization, the level access from KT deck will block skier access from the KT area for the ski-in/ski out residents and guests of much of the SVL. Night skiing won't work, as it does now if the hardscape is a barrier to skiing. Summer access of the area could be greatly complicated. Hardscape and terminal access details need to be illustrated now and not deferred to a design review process so that the public can assess and comment on potential impacts of and mitigation measures for the proposal.
- 0176-5 • The proposed enclosed gondola storage structures are a significant element that isn't illustrated in the plans and visual simulation of the Squaw Valley base terminals. Plan views and visual simulations and assessment of gondola storage structures need to be added as it will impact the visual and access elements that are being considered.
- 0176-6 • The operational sheds of the terminal should be located on the south side of the SV terminal (Alternates #2 & #3) to allow more space for potential screening and light and noise mitigation.
- 0176-7 • Landscape screening and softening of the terminal at SV resort might be most effective if plants commonly used in the surrounding area at SV Resort are used for these efforts. Strict use of native plants should not apply at the resort terminal. Landscape planting for screening and softening should be illustrated at the resort terminals in order for the public and SVL homeowners to assess the impact of new large structures in very close proximity to existing lodge buildings.

0176-2, Visual Resources (VR)

The plan view shown in the Draft EIS/EIR does show scale and represents the relationship between proposed infrastructure and adjacent structures. In addition, the visual simulations were created to give the public a better idea of what proposed infrastructure may look like from selected sensitive viewpoints. Please refer to View 21 for Alternative 2 (within Appendix D of the EIS/EIR) for a close-up view of what the Squaw Valley base terminal may look like near the Squaw Valley Lodge.

0176-3, Visual Resources (VR)

The Final EIS/EIR has been updated to include narrative discussion of impacts that may occur to Cushing Pond as a result of Alternatives 2 and 3. Please refer to page 4.2-28 under Impact 4.2-2: Visual Character in the Final EIS/EIR for further information.

0176-4, Visual Resources (VR)

For Alternatives 2 and 3, the Squaw Valley base terminal would be positioned at the east end of Cushing Pond. The terminal would be raised above the ground so that the loading platform elevation would be at approximately the same elevation as the KT Deck. The elevation of the KT Deck is 6,228 feet, and the elevation at the proposed location of the Squaw Valley base terminal ranges from 6,219 to 6,220 feet. Accordingly, the gondola loading platform would be 8 to 10 feet above the existing ground elevation in the area, and about 5-6 feet above the average snow level during winter.

There would be an elevated bridge connecting the KT Deck with the gondola loading platform; the bridge would be approximately 75 feet long and 30 feet wide. The bridge would range from 6-10 feet above the existing ground level and 3-6 feet above the average snow level during winter.

Detailed design of the gondola platform and hardscape has not yet been completed, but construction techniques would likely involve earthen embankment, steel and/or reinforced concrete structural elements and either brick paver or steel gate bridge/platform surface.

0176**0176-5, Visual Resources (VR)**

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

Also please note that in accordance with RPM SCE-1, the cabin storage structure would be subject to agency design review and approval.

0176-6, Visual Resources (VR)

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This comment will be considered in the development of base station design plans, pending project approval. Also, the cabin storage structure would be subject to the agency design review and approval process, in accordance with RPM SCE-1.

0176-7, Visual Resources (VR)

The specific plan of the Squaw Valley base terminal and cabin storage structure, including how vegetation may be applied to screen and/or soften the appearance of the base terminal, would be screened for compliance with both the Visual Management System (VMS) and Built Environment Image Guide (BEIG) prior to project implementation. These documents provide specific direction on how proposed infrastructure must be designed and constructed in a way that minimizes visual impact on the characteristic landscape. Please refer to Sections 4.2.1.2 and 4.2.2.1 of the Final EIS/EIR for detailed information on the BEIG and VMS, respectively.

Also, similar to responses 0176-5 and 0176-6 above, it is important to note that all proposed infrastructure would be subject to the design review and approval process prior to project implementation, in accordance with RPM SCE-1.

OPERATING SCHEDULE

“To perform maintenance, some cabins would need to be put on the line for limited periods during the summer (fewer than 10 times during the summer for running all cars on the line, and 3–5 days per month for limited numbers of cars moved across the line).”

0176-8

- Night time operation was also mentioned at several SVSH community outreach meetings. The EIS/EIR suggests a 6:00 pm closure time during typical use. (Draft EIS/EIR p. 2-14.) Operational hours should be specified beyond “typical use”. Night operation would add significant additional noise and light impact to SVL owners and guests. Impacts of proposed night use, beyond “typical” operations should be examined in detail, and to mitigate impacts associated with noise during sensitive nighttime hours a measure limiting night use should be included.
- Summer operation will add significant visual and noise impacts. It would seem this could allow for weekend use thru-out the summer for “maintenance”. During summer “maintenance” use, would passengers be allowed? Impacts of allowed summer schedule and hours of maintenance operation should be examined and defined in the EIS/EIR, and summer use should be conditioned on “maintenance only” use (i.e. no passengers/customers other than maintenance personnel).

NOISE

0176-9

- The close proximity of the gondola to sensitive receptors will increase noise impacts both on an intermittent and continuous basis for SVL owners and guests and adjacent residents and guests. Early morning start up, potential night operation and very close loading areas add up to significant additional noise impact. Direct drive systems, enclosed soundproofed motors, etc. could mitigate sound. Sound mitigation elements and technology should be included in terminal locations adjacent to residential/lodging structures.

CIRCULATION & ACCESS

0176-10

- Skier traffic is currently intersecting from many different directions at the proposed location of the Gondola Squaw Valley base station. There are skiers coming down Mountain Run heading east, coming down KT22 headed north and leaving the Village headed west all with different destinations. Adding the Gondola base station into this mix will worsen an already hazardous situation.

0176-8, Project Description (PD)

With the exception of maintenance needs, nighttime operation of the gondola is not proposed.

Night lighting and glare are analyzed in detail in the Draft EIS/EIR. Please refer to Impact 4.2-3 for all alternatives (analysis for Alternative 2 begins on page 4.2-31 of the Draft EIS/EIR). In particular, Impact 4.2-3 (Alt. 2) states: "lights would be used only for maintenance and to prepare for daily operations" and "Occasions when installed night lighting fixtures would be visible during nighttime hours would be very uncommon."

During the summer, the gondola would be in operation exclusively for maintenance purposes, and passengers would not be allowed. Please refer to pages 2-13 and 2-14 of the Draft EIS/EIR for further information.

0176-9, Noise (N)

The comment suggests that the new terminal station could result in significant noise impacts to guests and residents at Squaw Valley Lodge and that mitigation should be included to reduce impacts.

The noise sources and anticipated noise levels associated with the proposed base-terminal at Squaw Valley are discussed in detail on page 4.9-22 of the Draft EIS/EIR. As discussed in the Draft EIS/EIR, the drive units would be enclosed, as suggested by the comment. The gondola also would not operate at night, as suggested by the comment. As discussed on page 4.9-22, the new terminal station would not result in a substantial increase in noise relative to existing conditions where lift infrastructure and skier activity is already present. The proposed gondola would not operate during the sensitive times of the day or all year round. Therefore; the Draft EIS/EIR concludes that the Squaw Valley base-terminal would not result in significant noise impacts to nearby receptors.

0176-10, Recreation (R1)

The Squaw Valley base terminal under Alternatives 2 and 3 would be positioned within the area of Cushing Pond and would be largely outside of the existing ski run area in the vicinity of KT22 Chair, Squaw One Chair and the Tram, where

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most of this skier traffic originates. Additionally, the Squaw Valley base terminal under Alternatives 2 and 3 would be elevated above the ground to allow skiers to pass underneath the lift to transfer from west to east or east to west, as they do now. For this reason, it is not expected that Alternative 2 or 3 would worsen skier traffic or create a hazardous public safety issue in the vicinity of the Squaw Valley base terminal.

- 0176-11 | • SVL owners and guests enjoy and depend on ski-in and ski-out proximity to the slopes at SV. This will be compromised by blocking that most frequently used access.
- 0176-12 | • The most-used access is the area between the KT deck and Cushing Pond. This is the area slated for the “hardscape” connection to the Terminal planned for Alternates #2 and #3. The hardscape would cross and potentially block skier and pedestrian access.
- 0176-13 | • Skiers arriving at SV to get on the Gondola would be coming through SVL property or coming around the corner from Le Chamois heading right into skier traffic. This also worsens an already busy intersection at the end of SVL Building #3 with a great potential for accidents.
- 0176-14 | • Emergency egress should be examined as the current configuration of this area allows for vehicle access from the SVL property.
- 0176-15 | • Pedestrian and Skier access, including visitor parking should be analyzed and addressed in detail at the SV Terminal location, along Squaw Peak Road and at the intersection of Squaw Peak Road and Squaw Valley Road

LIGHTING

“Lighting would be required at the terminals and operating buildings to allow for maintenance outside of normal operating hours and to prepare for daily operations.”

- 0176-16 | • The terminal operating shacks should be located on the south side at the SV terminal to minimize visual impacts to adjacent residents associated with light pollution.
- 0176-17 | • Lighting will more than likely be required throughout the night for safety, janitorial and security. Such lighting should be limited to safety and security requirements, designed using Illuminating Engineering Society’s design guidelines, and in compliance with International DarkSky Association approved fixtures. The impacts on adjacent property owners should be examined and appropriate mitigation such as screening/shielding, low light placement directed downward and away from nearby residents, a limit on maximum wattage, and a limit on the number of allowed nighttime lights should be incorporated.
- 0176-18 | • Lighting hours of use should be regulated in recognition of adjacent residents.

0176-11, Recreation (R1)

Ski-in and ski-out access to and from Squaw Valley Lodge could be affected by Alternatives 2 and 3. The proposed elevated bridge connecting the KT Deck at the Olympic House with the Squaw Valley base terminal loading platform could block the most frequently used snow access route from Squaw Valley Lodge to KT22 and other lifts at the base of the ski area. The loss of this important snow access route would be mitigated by the creation of a new snow access route to the west of the base terminal, but this new route would be approximately 200 feet longer than the current route.

0176-12, Recreation (R1)

Pedestrian access over the hardscape would be maintained in full.

Skier access to the Squaw Valley Lodge between the KT Deck and Cushing Pond would be minorly affected by Alternative 2 through the addition of the hardscape, but access would not be blocked. Skiers would be required to walk approximately 30 additional feet to cross the hardscape before putting on or after removing their skis (depending on whether skiers are heading to the hill or leaving it), but access would not be blocked. Furthermore, true ski-in and ski-out access to the Squaw Valley Lodge would remain on the opposite (west) side of the base terminal.

0176-13, Recreation (R1)

Skiers already arrive to this area to access the Squaw One Express, KT-22 Express, and/or the Gold Coast Funitel. As the gondola project is estimated to cause a 1.4% increase in visitation at Squaw Valley and Alpine Meadows (please refer to Appendix C -Final Visitation and Use Assessment in the Draft EIS/EIR), traffic in this area would not be significantly increased.

0176-14, Public Safety (PS)

It is not expected that emergency egress would be adversely affected by the project.

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The comment lacks sufficient detail, so no further response is warranted.

0176-15, Recreation (R1)

Section 4.7, "Transportation and Circulation" in the Draft EIS/EIR analyzes project impacts related to parking, Squaw Peak Road, and at the Squaw Valley Road/Squaw Peak Road intersection under all time periods and scenarios. Impacts were found not to be significant, and therefore, no mitigation was required.

Pedestrian access over the hardscape would be maintained in full.

Skier access to the Squaw Valley Lodge between the KT Deck and Cushing Pond would be minorly affected by Alternative 2 through the addition of the hardscape, but access would not be blocked. Skiers would be required to walk approximately 30 additional feet to cross the hardscape before putting on or after removing their skis (depending on whether skiers are heading to the hill or leaving it), but access would not be blocked. Furthermore, true ski-in and ski-out access to the Squaw Valley Lodge would remain on the opposite (west) side of the base terminal.

0176-16, Visual Resources (VR)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0176-17, Visual Resources (VR)

With the exception of maintenance needs, nighttime operation of the gondola is not proposed.

Night lighting and glare are analyzed in detail in the Draft EIS/EIR. Please refer to Impact 4.2-3 for all alternatives (analysis for Alternative 2 begins on page 4.2-31 of the Draft EIS/EIR). In particular, Impact 4.2-3 (Alt. 2) states: "lights would be used only for maintenance and to prepare for daily

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operations" and "Occasions when installed night lighting fixtures would be visible during nighttime hours would be very uncommon."

With respect to the mitigation requested by the commenter, RPM SCE-8 states that, "... Building lighting shall be shielded and directed downward such that the bulb or ballast is not visible..." For further information, please refer to the full text provided for RPM SCE-8 in Appendix B of the Draft EIS/EIR. Building lighting will also be subject to Placer County lighting standards and the design review and approval process by the Forest Service.

0176-18, Visual Resources (VR)

Lighting hours of use have been disclosed in the Draft EIS/EIR. In particular, page 4.2-31 of the Draft EIS/EIR states that, "The gondola would typically operate each day during the snow sports season from just before Alpine Meadows and Squaw Valley open until soon after closing (approximately 8:00 a.m. to 6:00 p.m.), so lighting fixtures would be activated only during a short period after sunset." Please refer to Impact 4.2-3 (Alts. 2 and 3) in the Draft EIS/EIR for further information.

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CUSHING POND

- 0176-19
- Drainage and flooding are significant issues with the SVL as it had a very significant flood and debris flow event in 1996/97. Alterations to Cushing Pond would have uphill drainage impacts, impacting not just Cushing Pond but also Squaw Creek. Alterations and especially reductions in capacity for storm water storage at Cushing Pond should be illustrated, defined and calculated as part of the initial design and mitigation elements.
- 0176-20
- Cushing pond is a highly cherished feature of the base of Squaw Valley which provides scenic views, a buffer for SVL owners from many resort activities as well as a place of relaxation and social engagement. The peaceful setting and, views, and overall visual character of the site would be negatively impacted by the location and buildout of the SV terminal and gondola storage under alternatives #2 and #3.
- 0176-21
- Cushing Pond (circa 1950) pictured below: It appears that the pond was part of the Squaw Creek South and modified to form a pond for the initial SV Resort development. Contrary to representations in the EIS/EIR, Cushing Pond is rarely, if ever, drained for repairs. There is constant evidence of tree frogs at Cushing Pond. Cushing pond should be retained in its current location and size for all the benefits it provides for guest of the SV Resort and adjacent property owners.



0176-19, Hydrology and Water Quality (H&WQ)

This comment addresses concerns regarding drainage capacity and attendant impacts associated with high stormwater flows. Effects of flooding from implementation of the project are addressed in Impact 4.17-5 of the Draft EIS/EIR. The impact identifies that, "RPMs WQ-9 and WQ-10 require that a Registered Civil Engineer conduct a stormwater drainage study for both Squaw Valley and Alpine Meadows, and the site proposed for development in the implementation plans, to determine whether the development would produce runoff that would exceed the capacity of existing stormwater infrastructure, cause localized ponding, or increase the potential for property damage from flooding. The report would identify water quality protection features and methods to be used during and after construction, as well as identify how stormwater runoff would be reduced to pre-project conditions. The Forest Service would adhere to standards equally stringent to or more stringent than Placer County RPMs WQ-9 and WQ-10." This report would be completed prior to final project approval and project implementation. The approach taken to address drainage and water quality must meet established County standards and requires that stormwater run-off shall be reduced to pre-project conditions. This approach provides success criteria against which the effectiveness of the mitigation will be judged, and the process and mechanisms to achieve that success criteria.

0176-20, Visual Resources (VR)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0176-21, Project Description (PD)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

“The human made ponds that would be indirectly affected by Alternative 2 such as Cushing Pond and the snowmaking pond near the Alpine Meadows Base Terminal do not meet the definition of this PCE since they do not hold/maintain water during the entire tadpole growth phase (a minimum of 2 years). These ponds are drained yearly for repairs, and the water within the snowmaking pond at Alpine Meadows is used in the winter months to produce snow.”

CONCLUSION:

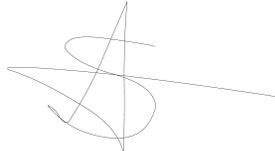
- 0176-22 | • The SVL opposes Alternatives 1, 2 & 3 but strongly supports Alternative 4. While impacts to the existing visual character are significant and unavoidable under Alternatives 2, 3 and 4, such impacts are substantially lessened under Alternative 4.

Thank you for the opportunity to comment on this document. If you would like to contact us please reach out to our Property Manager, Evan Benjaminson, at 530-214-3375 or evanb@gpeak.com.

Sincerely,



David Walters, President
Squaw Valley Lodge Owners Association



Steven Arns, B2B Committee Chair
Squaw Valley Lodge Owners Association

0176-22, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter’s opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.



**Pacific Crest Trail
Association**

Northern Sierra Regional Office

0179

June 7, 2018

U.S. Forest Service, Tahoe National Forest, Truckee Ranger District
c/o NEPA Contractor
P.O. Box 2729
Frisco, CO 80443

Placer County Community Development Resources Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
Attention: Shirlee Herrington, Environmental Coordination Services

*This letter submitted online at Comments@squawalpinegondola-eis.com and
cdraecs@placer.ca.gov*

**RE: Public Comments for Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project,
Draft Environmental Impact Statement/Environmental Impact Report, Tahoe National
Forest**

Dear Review Officer(s),

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management, maintenance and protection of the Pacific Crest National Scenic Trail (PCT). As such, it is PCTA's role to advocate for the best possible protection of the PCT and the experience it offers to hikers and equestrians. The PCTA has a solid partnership with the Tahoe National Forest in the management and maintenance of the PCT.

PCTA appreciates and acknowledges the need for the Tahoe National Forest to provide multiple uses across the forest and public lands and supports such management. We support the provision of a variety of opportunities for developed and dispersed recreation experiences throughout public lands.

PCTA has reviewed the Draft EIS/EIR and has a clear understanding of the purpose and need of the proposed Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project. PCTA was pleased to see the PCT included and addressed throughout the Draft EIS/EIR.

First and foremost, the Squaw Valley/ Alpine Meadows Base-to-Base Gondola project does not appear to serve the general population. Mainly benefitting are the project proponents and visitors at Squaw Valley and Alpine Meadows. It is difficult to recognize how this will be a benefit for the many versus a benefit for the few. It is imperative to ask the question, does this really benefit the general public? Does impacting a congressionally designated trail and congressionally designated wilderness warrant the benefits? Please consider these items

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*Celebrating 50 years of the PCT
as a National Scenic Trail.*



0179-1, Purpose and Need (P&N)

The goal of the Draft EIS/EIR is to provide the decisionmaker with the best available data and analysis related to potential impacts that the project may have on individual resources; with that information, the decisionmaker determines whether or not the project, with all of its impacts (both beneficial and adverse), would meet the project's identified purpose and need.

Please refer to the Draft Record of Decision for this project, which provides the decisionmaker's detailed rationale on how the project would or would not meet the project's identified Forest Service purpose and need. Placer County's decision on how the project would or would not meet the project's identified CEQA project objectives will be made by the Placer County Board of Supervisors.

0179-1
cont'd

throughout the analysis of the project, for the impacts associated with the project are of great magnitude and are long-term.

0179-2

After reviewing the Alternatives identified in the Draft EIS/EIR, PCTA would prefer to see Alternative 1 (No Action) implemented above all other Alternatives. The project itself will have long-term visual impacts and a negative effect on the trail experience due to the proximity of the project. The project also threatens the protection and overall wilderness character of the Granite Chief Wilderness (GCW), which is an integral part of the PCT experience. The PCT is a congressionally designated National Scenic Trail that people from all over the country and the world come to hike and horseback ride on. The experience on the PCT is paramount and the intent of the trail is "...to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails pass." (National Trails System Act, Sec. 3.b)

0179-3

Regarding the preferred Alternative, Alternative 2, which is favored by the proponent of the project, PCTA *strongly urges the Tahoe National Forest to disregard Alternative 2 as an option* and implement either Alternative 3 or Alternative 4, or a combination of the two. PCTA opposes the preferred Alternative 2 due to the following items:

"The central portion of the Alternative 2 alignment is located just east of the GCW and would cross private lands within the Congressionally-Mapped GCW. This close proximity to the GCW would result in adverse impacts related to visual resources, noise, and wilderness. This middle segment would traverse a distance of approximately 3,000 feet along or near the ridgeline between the two resorts, and therefore has the greatest effect on visual character among the three action alternatives. Due to the close proximity of Alternative 2 to the GCW, this alternative would have the greatest noise effect on the GCW during project construction." (DEIS/EIR e-page 26, page es 1) The National Trails System Act states that "Other uses along the trail, which would not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established." (Sec. 7.c) Alternative 2 *does substantially interfere* with the nature and purposes of the trail and would not comply with the National Trail System Act.

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"Alternative 2 would result in adverse effects on visual character because its gondola alignment would traverse the ridgeline separating the National Forest System-GCW and the Caldwell property. The viewpoint analysis indicates that gondola infrastructure would be particularly evident high along this ridgeline..." (DEIS/EIR e-page 92, page 2-37) The DEIS/EIR also states that "...the project could be visible from a section of trail [PCT] approximately 2.5 miles north, near the Granite Chief lift at Squaw Valley, but vegetation would likely screen this view. The project could also be visible from the PCT near the Five Lakes and Alpine Meadows..." (e-page 129, page 4.1-12) A significant visual impact seen from the trail, especially in wilderness, *does substantially interfere* with the nature and purposes of the trail. Listed above are three (3) identified locations in Alternative 2 where the project would have a visual impact from the PCT. In addition, impacts on the GCW wilderness and its character would be reduced if Alternative 3 or 4 were implemented.

0179-1 cont'd, Purpose and Need (P&N)

0179-2, Alternatives (A)

Impacts that could occur to recreation (including trail experience on the PCT), visual resources, and the Granite Chief Wilderness are analyzed in detail in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness," respectively. Please refer to those sections for specific discussion of how potential resource impacts may affect the PCT.

0179-3, Alternatives (A)

Please note that Alternative 2 is referred to as the Proposed Action Alternative, as identified in the Executive Summary and in Section 1.4 of the Final EIS/EIR. Alternative 2 is not the "preferred Alternative," as stated by the commenter.

Adverse impacts that would occur to the PCT are acknowledged and discussed on pages 4.1-10 through 4.1-12 of the Draft EIS/EIR, but these adverse impacts would be minor.

In particular, pages 4.1-11 and 4.1-12 state the following: "The PCT is approximately 0.5 mile from the gondola alignment associated with Alternative 2 at its closest point. Short-term direct impacts to the trail experience during construction are not anticipated because the trail is separated from the project site by topography and vegetation, which would screen noise and visual impacts. Long-term visual impacts on the trail would be negligible; the project could be visible from a section of trail approximately 2.5 miles north, near the Granite Chief lift at Squaw Valley, but vegetation would likely screen this view. The project could also be visible from the PCT near the Five Lakes and Alpine Meadows, but in areas where vegetation would likely screen the view. The PCT would not be closed at any point during the construction phase."

Topography and/or vegetation would likely screen visibility of the gondola from the few locations along the PCT where visibility is possible. Potential adverse impacts to the PCT would not constitute a substantial interference with the nature and purposes of the PCT, and therefore, Alternative 2 would not be inconsistent with the National Trails System Act.

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0179-4, Visual Resources (VR)

The comment does not provide specific reasons specifying why the Draft EIS/EIR is inadequate. Therefore, a response cannot be provided.

Visual and experiential impacts that would occur to the PCT are described in Sections 4.1, "Recreation" and 4.3, "Wilderness."

0179-5

“Alternative 2 would adversely affect the dispersed recreation experience on nearby trails and wilderness areas, including the Five Lakes Trail, the PCT, and the National Forest System-GCW.” (DEIS/EIR e-page 127, page 4.1-10) In addition, “Alternative 2 has adverse effects on opportunities for Solitude or Primitive and Unconfined recreation.” (DEIS/EIR Table 2-3, Impact 4.3-4, e-page 87, page 2-32) Implementing Alternative 3 or 4 would significantly enhance the opportunities for solitude or primitive and unconfined recreation. This trail segment of the PCT and the GCW falls under the *Primitive* class of the Recreation Opportunity Spectrum (ROS). This area is managed to “...provide users with a primitive recreation experience. These [trail] segments are set in an essentially unmodified environment. Evidence of humans would be unnoticed by an observer wandering through the area.” (Forest Service PCT Comprehensive Plan, Ch. 5, Sec. a) Alternative 2 is in direct conflict with this ROS class and there is a greater potential for degradation of the recreational objectives.

0179-6

PCTA supports Alternative 3 and Alternative 4 over the proposed Alternative 2. Amongst Alternative 3 and 4, PCTA *favours Alternative 3* for the following reasons:

“...Alternative 3 would locate the Squaw Valley mid-station closer to the GCW than Alternative 4, the mid-station under Alternative 4 would be on a peak and would therefore be more visible to the surrounding area than the Alternative 3 mid-station location. As such, Alternative 3 has slightly less effect on visual character compared with Alternative 4.” (DEIS/EIR e-page 27, page es 10) The location of the mid-station is a crucial aspect of the visual impacts involved with the project. Having structures on peaks and along horizons cause significant impacts to the viewshed and have the tendency to dominate the landscape. In addition, anything that is moving attracts the attention of the recreational user, instead of the natural landscape.

“Impacts to dispersed recreation would be more substantial as a result of the alignment associated with Alternative 2, as users would pass beneath the gondola line far along the Five Lakes Trail, in an area where the recreational experience is already very remote; with implementation of Alternative 3 or 4, users would pass beneath the gondola line earlier in their hike, in proximity to existing development and infrastructure, meaning that the new infrastructure associated with Alternative 3 or 4 would represent less of a contrast with the existing landscape than the infrastructure associated with Alternative 2.” (DEIS/EIR e-page 128, page 4.1-11) Implementing Alternative 3 would have less of a negative effect on the visitor utilizing the 5 Lakes Trail for access to the PCT or GCW.

Included in the Draft EIS/EIR is a statement addressing the distance of Alternative 4 from that of the PCT. (DEIS/EIR e-page 27, page es 10) It is true that Alternative 4 would be the most distant from the PCT, though the overall difference between Alternative 3 and Alternative 4 is negligible. It is not a great enough distance to where the visual impacts of Alternative 4 would be drastically reduced. Therefore, PCTA *favours Alternative 3* due to its alignment with the topography and land itself. This alignment would have the least visual impact from the PCT and overrides the greater distance from the PCT in Alternative 4.

The following are the Resource Protection Measures (RPM) detailed in the Draft EIS/EIR which PCTA supports and would take issue if they were removed from the project:

0179-7

0179-5, Recreation (R1)

The Final EIS/EIR discusses recreation consistency with relevant Land Use Plans for Alternative 2 in Section 4.1-3. Alternative 2 would include amendments to the Alpine Meadows SUP area, but would be consistent with all relevant Forest Service ROS classifications as well as County and other local plans applicable to private lands. This includes the ROS classification of Primitive, which is applicable for the National Forest System-GCW and the portions of the PCT contained within the National Forest System-GCW.

More specifically, while some gondola infrastructure would likely be evident from within the National Forest System-GCW, Alternative 2 would not represent an inconsistency with this ROS classification. This is because Alternative 2 would cause no modification of the natural environment of the National Forest System-GCW; interactions between users of the National Forest System-GCW would remain very low; and the National Forest System-GCW would remain essentially free from human-induced restrictions and controls (as well as evidence of these restrictions and controls). For further discussion in the Final EIS/EIR, please refer to Section 4.1.1.2, which defines the ROS classification of Primitive, and Impact 4.1-3 (Alt. 2), which explains the consistency of Alternative 2 with the ROS classification of Primitive.

It is also important to note that recreational impacts to the PCT would be lesser than those that would occur along the Five Lakes Trail and on the eastern edge of the National Forest System-GCW, because the PCT is considerably further to the west and thus, further from the project area. It is likely that the only recreational impacts that would occur to the PCT would be noise impacts resulting from occasional helicopter usage during the construction phase. Helicopters would be used during the construction phase to transport personnel and equipment to the project area, and during installation of lift infrastructure. Total helicopter usage over a 180-240-day construction season is not anticipated to exceed approximately 20 days.

0179-6, Alternatives (A)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning

0179

Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0179-7, Resources Protection Measures/Mitigation Measures (RPM/MM)

The comment lists various RPMs of which the comment is supportive. All RPMs and mitigation measures included in the Draft EIS/EIR are also included in the MMRP (see Appendix I of the Final EIS/EIR), which will be adopted by the County and implementation will be overseen by the Forest Service and the County.

Regarding RPM NOI-3, the comment requests that helicopter flight patterns should also be designed to avoid and minimize flights over the PCT to the extent practical. In response to this comment, RPM NOI-3 is revised as follows:

Helicopter flight patterns will be designed to avoid and minimize flights over residential areas ~~and, the National Forest System - Granite Chief Wilderness Area, and the Five Lakes Trail~~ to the extent practical. For Alternatives 3 and 4, helicopter flights over the National Forest System -Granite Chief Wilderness will be prohibited.

Regarding RPM NOI-6, the comment requests that construction-related blasting and helicopter flights should not be allowed to occur on Saturdays. In response to this comment (and comment 0166-23), RPM NOI-6 is revised as follows:

Construction noise emanating from any construction activities, including any blasting and helicopter flights, is prohibited on ~~Sundays~~ weekends and Federal Holidays, and shall only occur:

- a) Monday through Friday, 6:00 am to 8:00 pm (during daylight savings)
- b) Monday through Friday, 7:00 am to 8:00 pm (during standard time)
- c) ~~Saturdays, 8:00 am to 6:00 pm~~

In addition, temporary signs 4 feet x 4 feet shall be located throughout the project, as determined by the Placer County Development Review Committee (DRC), at key intersections depicting the above construction hour limitations. Said signs shall include a toll free public information phone number for the Disturbance Coordinator where surrounding residents can report violations and the ~~developer/builder~~ Disturbance

0179

Coordinator will respond and resolve noise violations. The Disturbance Coordinator will respond to noise complaints in accordance with the requirements of RPM NOI-2. This condition shall be included on the Placer County Improvement Plans and shown in the County's development notebook.

Pacific Crest Trail Association

0179

0179-7
cont'd

- Completing all ground disturbing activities and construction of the gondola alignment in a single construction season. All site clean-up, soil stabilization, revegetation, winterization, and related activities will be completed by October 15. (MUL-7)
- Notice of all construction activities potentially affecting recreation areas and trail systems, including temporary trail closures, within the Forest Service trail system. (REC-2)
- Signs advising recreationists of construction activities and directing them to alternative trails will be posted at all trail access points or in locations as determined through coordination with the respective jurisdictional agencies. Signage describing the closures will be posted at trail access points one week prior to closures, will remain posted during the entire closure period, and will be removed upon completion of construction. (REC-3)
- Signage will be posted at both the Squaw Valley and Alpine Meadows base terminals and mid-stations stating that walking or hiking trail access directly from the gondola (i.e., by exiting at a mid-station) is strictly prohibited. (REC-4)
- Prior to development of above ground structures, facilities, and features, design plans will be reviewed and approved by the Forest Service as part of the Design Review Process. Applicable structures must meet the Built Environment Image Guide (BEIG) guidelines. (SCE-1)
- Choose structure design, scale, and color of materials, location, and orientation to meet the Forest Service visual quality objective of the Project Area and reduce potential visual contrast. (SCE-2)
- Stumps must be cut as low as possible to the ground to avoid safety hazards and lessen scenic impacts. (SCE-3)
- All structures, facilities, and above ground features will meet color guidelines. Bright colors are inappropriate for the forest setting. The colors must be muted, subdued colors because they blend well with the natural color scheme. (SCE-4)
- All structures, facilities, and above ground features will meet applicable reflectivity guidelines. This includes any reflective surfaces (metal, glass, plastics, or other materials with smooth surfaces), that do not blend with the natural environment. (SCE-5)
- Trees will be retained, where possible, to provide species and size diversity, maintain forest cover, and screen facilities. (SCE-6).
- The night lighting design shall be designed to minimize impacts to adjoining and nearby land uses. No lighting is permitted on top of structures. (SCE-8)
- Helicopter flight patterns will be designed to avoid and minimize flights over residential areas and the Granite Chief Wilderness Area to the extent practical. (NOI-3)
 - **Note:** PCTA requests that the PCT be incorporated into this RPM.
- Construction noise emanating from any construction activities, including any blasting and helicopter flights, is prohibited on Sundays and Federal Holidays, and shall only occur:
 - a) Monday through Friday, 6:00 am to 8:00 pm (during daylight savings)
 - b) Monday through Friday, 7:00 am to 8:00 pm (during standard time)
 - c) Saturdays, 8:00 am to 6:00 pm (NOI-6)
 - **Note:** PCTA requests that blasting and helicopter flights *Not occur on Saturdays*, for Saturdays see the most visitor use out of any day of the week.

In addition to the RPM's above, PCTA suggests the project incorporate the following RPM's:

0179-8

0179-7 cont'd, Resources Protection Measures/Mitigation Measures (RPM/MM)

0179-8, Resources Protection Measures/Mitigation Measures (RPM/MM)

An additional RPM stating that project components must meet the VQO of Partial Retention (where applicable) is not necessary because project components would be compliant with all direction provided by the VMS. In particular, the Draft EIS/EIR states on page 4.2-23 that "Alternative 2 would be compliant with the Partial Retention VQO designated for upslope facilities at Alpine Meadows." Please refer to Section 4.2, "Visual Resources" for further discussion related to the project's compliance with the VMS and other applicable regulations.

Pacific Crest Trail Association

0179

0179-8
cont'd
0179-9

- Project impacts will meet a Visual Quality Objective (VQO) of partial retention and must be retained. (Forest Service SMS)
- Project implementation activities will be communicated with PCTA staff.
 - PCTA will use its public website to alert trail users of the project activities and associated impacts.
- Project will offset associated impacts with the development of safe and adequate parking facilities at the 5 Lakes trailhead.
 - The amenities at the 5 Lakes trailhead do not adequately serve the public. Visitation far exceeds the trailhead resources. Currently, trailhead parking is completely absent. In addition, the LRMP identifies the 5 Lakes trail as one of the most popular day hikes on the Tahoe National Forest.

0179-10

0179-11

Please note that PCTA recognizes that Alternative 4 results in less of an overall effect in various areas such as recreation and noise but prefers Alternative 3 regarding the PCT and the experience the trail should offer to hikers and equestrians.

PCTA staff are eager and willing to provide time and support with this project as it develops to ensure that the PCT receives the appropriate management as intended with its designation as a National Scenic Trail. Please let me know if you or your staff has questions regarding PCTA's comments on the Squaw Valley/ Alpine Meadows Base-to-Base Gondola Project. Thank you for your time and support.

Sincerely,



Connor Swift
PCTA Northern Sierra Regional Representative

CC:
Beth Boyst, U.S. Forest Service
Joanne Roubique, U.S. Forest Service
Joe Flannery, U.S. Forest Service
John Groom, U.S. Forest Service
Justin Kooyman, PCTA

0179-8 cont'd, Resources Protection Measures/Mitigation Measures (RPM/MM)

0179-9, Resources Protection Measures/Mitigation Measures (RPM/MM)

RPMs REC-1, REC-2, and REC-3, provide mechanisms for SVSH to coordinate with and notify the Forest Service and the public regarding construction activities, install signage to inform the public about trail reroutes and/or temporary closures, and avoid conflicts with planned events. This coordination would include coordination with PCTA, which could then use its public website to alert trail users of the project activities and associated impacts, as suggested in the comment. No changes to the existing RPMs or addition of a new RPM specific to coordination with PCTA is warranted.

0179-10, Resources Protection Measures/Mitigation Measures (RPM/MM)

Development of parking facilities at the Five Lakes Trailhead will not be required through an additional RPM because the analysis conducted for the project does not indicate that additional visitation on the Five Lakes Trail would occur. As such, an additional RPM would not be necessary in response to this issue as perceived by the commenter.

0179-11, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.



foriver
TRUCKEE RIVER WATERSHED COUNCIL

June 1, 2018

Joe Flannery
US Forest Service, Tahoe National Forest
631 Coyote St.
Nevada City, CA 95959

Heather Beckman
Placer County Planning Services Division
775 North Lake Boulevard
Tahoe City, CA 96165

Via: jflannery@fs.fed.us; hbeckman@placer.ca.gov

Dear Mr. Flannery and Ms. Beckman,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report for the Squaw Valley-Alpine Meadows Base-to-Base Gondola project.

The mission of the Truckee River Watershed Council (TRWC) is to bring the community *Together for the Truckee* to protect, enhance, and restore the Truckee River watershed. We identify, coordinate, fund, and implement restoration and preservation projects directly related to the watershed's health, beauty, and economy. Combining sound science and a deep understanding of our region's values, we focus on the root causes of threats to the Truckee River watershed. As such, we are interested in the proposed project.

TRWC understands there are four alternatives under consideration: 1) no action; 2) the proposed action alternative; and 3 & 4) alternative actions. The proposed action alternative will have severe and transformative effects on the environment of Bear Creek, Olympic Valley, and Granite Chief Wilderness. Particularly notable are the 1) serious and unavoidable effects on sensitive species such as the Sierra Nevada yellow-legged frog; 2) the intrusion into Granite Chief Wilderness; 3) long-term impacts to water quality in the Squaw Creek, Bear Creek, and Truckee River watersheds; and 4) the adulteration of the visual character of the iconic Olympic Valley.

The effects of the proposed action would be far-reaching and irreversible. It runs counter to TRWC's goal of completing 50 high

0189-1

0189

0189-1, Other (O2)

These issues are addressed in the Draft EIS/EIR in Sections 4.3, "Wilderness," 4.14, "Wildlife and Aquatics," 4.17, "Hydrology and Water Quality," and 4.2, "Visual Resources," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

The comment implies that there would be significant and unavoidable impacts related to Sierra Nevada yellow-legged frog, the Granite Chief Wilderness, water quality, and visual resources under Alternative 2. This is not entirely true, in that the only significant and unavoidable impacts associated with the project include an impact to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

The remainder of this comment is directed towards the project approval process. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

530.550.8760
P.O. Box 8568
Truckee, CA 96162
www.truckeeriverwcc.org

Truckee River Watershed Council is a nonprofit 501(c)3 organization.

0189-1 cont'd, Other (O2)

0189-1
cont'd

priority projects in the next 10 years to improve the health, function, and resilience of the watershed.

In light of these severe impacts, TRWC urges the US Forest Service and Placer County not to select the proposed action alternative. Thank you for your consideration.

Sincerely,



Lisa Wallace
Executive Director



Matt Freitas
Program Manager

530.550.8760
P.O. Box 8568
Truckee, CA 96162
www.truckeeriverwc.org

Truckee River Watershed Council is a nonprofit 501(c)3 organization.

0001

Date submitted (Pacific Standard Time): 5/22/2018 3:32:00 PM
 First name: Nick
 Last name: Anderson
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1:
 Address2:
 City:
 State:
 Province/Region:
 Zip/Postal Code:
 Country: United States
 Email: radfillmorepad@gmail.com
 Phone:
 Comments:

0001-1

I would like to voice my opinion in opposition to the base to base gondola project. The fact that the proposals most "environmentally superior" version still has 33 adverse environmental impacts shows that there really is no way to build it without having an array of negative effects. The proposed benefits are a very weak proposition compared to the negative aspects of it.
 I am a long time Squaw Valley and Alpine meadows resort skier who buys a season pass every year, a backcountry skier who enjoys exploring the local area, and someone who repeatedly enjoys hiking in the 5-lakes basin area of the Granite Chief wilderness.

As someone who uses the Sierra Club backcountry huts in the Tahoe area, I remember that the former Bradley hut used to be situated in the 5-Lakes basin. That hut was a very low-impact, in tune with nature shelter to allow for non-powered human recreation. And when congress designated the Granite Chief wilderness, the Sierra Club did the right thing and tore down that Bradley hut. It was re-built in the pole creek drainage off highway-89, because adhering to the strict definition of having no human development in a wilderness area was a higher goal than even keeping a small hut that was already built there.

The impact of the construction, lift towers and all the rest to the beauty and solitude of the area would be incalculable. The fact that Granite Chief is a federally designated wilderness is not something that Squaw Valley should be able to tamper with just so they can grow their business or to offer minor convenience to skiers.

The USDA/National Forest should not grant permission to run the gondola through land designated by Congress for national wilderness protection. That is not a higher ideal than the protection of wilderness for the benefit of the greater public and the ecosystem itself.
 Thank you for your consideration.

0001-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0002

Date submitted (Pacific Standard Time): 5/20/2018 6:29:54 AM
First name: Anon
Last name: Anon
Organization:
Title:
Official Representative/Member Indicator:
Address1:
Address2:
City:
State:
Province/Region:
Zip/Postal Code:
Country: United States
Email:
Phone:
Comments:

I support Alternative 1- the no action alternative. The base to base gondola will not alleviate traffic and greatly impair the scenic values of an area immediately adjacent to Granite Chief Wilderness.

0002-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0003

Date submitted (Pacific Standard Time): 6/11/2018 4:01:57 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email: Hallan2290@gmail.com

Phone:

Comments:

0003-1

This will create irreversible damage to the Lake and create an amusement park feel which is not the reason people go to Tahoe. And it will only make the traffic worse. There is no demand or need for this.

0003-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0004

Date submitted (Pacific Standard Time): 5/21/2018 2:42:38 PM
First name: Tyler
Last name: Asher
Organization:
Title:
Official Representative/Member Indicator:
Address1: 371 jackpine st.
Address2:
City: Tahoe City
State: CA
Province/Region:
Zip/Postal Code: 96145
Country: United States
Email: Tyler2216@gmail.com
Phone: 6178354083
Comments:
To whom it may concern, I am writing to you today in opposition of this proposed base to base gondola. I don't believe that it is going to address the issues of traffic and congestion in the valleys when operating. Also, I believe it will take away from each valleys unique characteristics that make people choose which to visit in the first place. Thank you.

0004-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0004-1

0005

Shirlee Herrington

From: Michael Ayers <mayers@nevadafirm.com>
Sent: Friday, May 18, 2018 12:23 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: US Forest Service & Placer County release draft environmental studies

Dear USFS/Placer County:

0005-1

I support the California Express Gondola because it will further promote the Tahoe area ski resorts, the ability to hold Olympic and FSI Events in the Tahoe area, which will create additional jobs, and secure Tahoe as one of the leading ski areas in the United States. Moreover, according to the most recent report, the expansion of the Gondola will assist with traffic and consumption of fossil fuels; currently there is a shuttle system in place between the two resorts which creates an additional carbon footprint.

Regards,

Mike Ayers

Michael Ayers
 Attorney
 Reno Office



Tel: 775.851.8700 | Fax: 775.851.7681
 800 S. Meadows Parkway, Suite 800, Reno NV 89521

Tel: 702.791.0308 | Fax: 702.791.1912
 400 S. 4th Street, Suite 300, Las Vegas NV 89101

www.nevadafirm.com

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0005-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0006

Date submitted (Pacific Standard Time): 5/22/2018 3:05:57 PM
First name: Elena
Last name: Bakker
Organization:
Title:
Official Representative/Member Indicator:
Address1: 909 112th Ave NE
Address2: Apt 810
City: Bellevue
State:
Province/Region: Washington (WA)
Zip/Postal Code: 98056
Country: United States
Email: erb339@nyu.edu
Phone: 3602984776

Comments:
One of the most beautiful, awesome, and true places on this earth left is the Tahoe and Truckee mountains, lakes, and land. In a world that is building building building, saving the few true natural treasures that remain is not only necessary, but a mandatory human act.

The idea of destroying the beautiful land the locals SURVIVE on for simple tourist attractions? Appalling does not even cover it.

Do not let the greed of human money destroy one of the last true places that show us WHY we live.

0006-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0006-1

0007

Shirlee Herrington

From: Daniel Baldassare <dbald27@gmail.com>
Sent: Monday, June 11, 2018 3:20 PM
To: Placer County Environmental Coordination Services
Subject: proposed construction of the Squaw Valley Alpine Meadows base-to-base gondola project and its impacts

0007-1

I am writing to oppose the construction of the Squaw Valley to Alpine Meadows gondola. As a former resident in the area and avid backpacker and hiker, I am aware of the damage this project would do to an already over developed area. This project is not a reasonable way to alleviate congestion, and given the size of the two resorts adds little benefit regardless.

0007-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0008

Date submitted (Pacific Standard Time): 4/30/2018 9:59:53 AM
First name: Jeff
Last name: Ball
Organization:
Title:
Official Representative/Member Indicator:
Address1: 2436 Park Estates Dr
Address2:
City: Sacramento
State: CA
Province/Region:
Zip/Postal Code: 95825
Country: United States
Email: telecranker@yahoo.com
Phone: 9164878152
Comments:

As a back-country skier, hiker, backpacker and former Tahoe resident, I object to any proposal to build a gondola between Squaw Valley & Alpine Meadows. Turning Sierra wilderness into a theme park for the rich is not acceptable. And turning Hwy 89 into a parking lot is not acceptable.

0008-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0009

Date submitted (Pacific Standard Time): 6/10/2018 8:48:31 AM
First name: Jeff
Last name: Ball
Organization: CAH311738968
Title:
Official Representative/Member Indicator:
Address1: 2436 Park Estates Dr
Address2:
City: Sacramento
State: CA
Province/Region:
Zip/Postal Code: 95825
Country: United States
Email: jeffball@gmail.com
Phone: 9164878152
Comments:

0009-1

As a back-country skier and hiker, I am opposed to any ski resort incursion into Granite Chief Wilderness. Lift towers are not acceptable! The wanton expansion of Squaw Valley is disgusting. Tahoe is being ruined by developers, who have bought-off the 4 Placer Co supervisors who do not live up there. Traffic is already terrible and will be even worse. Fire safety has not been adequately addressed. Air Quality will be noticeably degraded. Kiss Tahoe goodbye.

0009-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: Walter F. Baumgartner <walter@cypressgrowth.com>
Sent: Friday, May 18, 2018 1:32 PM
To: Placer County Environmental Coordination Services
Subject: Squaw/Alpine Connection

0011-1 | Hello,
I support the Squaw/Alpine gondola connecting the two ski areas. I enjoy skiing both areas and it would be more convenient to have a gondola versus a shuttle; it would also be more environmentally friendly.
Best,
Walter

Walter Baumgartner
312 Edgecliff Way
Tahoe City, CA

0011-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0012

Shirlee Herrington

From: Steve Bemus <stevebemus@gmail.com>
Sent: Monday, June 04, 2018 6:58 AM
To: Placer County Environmental Coordination Services
Subject: I support California Express Gondola

Dear USFS/Placer County:

0012-1 | I support the California Express Gondola because it will enhance outdoor opportunities for my kids and help move traffic in the area (environmental benefit). It may also be an economic benefit to the Lake Tahoe, Truckee, Reno, Sacramento regions.

Thx,
Steve B.

Typos courtesy of iPhone 🍏

0012-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0013

June 5, 2018

County of Placer
 Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive
 Auburn, CA 95631

VIA EMAIL

RE: **Draft Environmental Impact Report (DEIR) for the Squaw Valley/Alpine Meadows Base-to-Base Gondola Plan**

Dear Placer County and US Forest Service:

- 0013-1 | My name is Mary Bennett, and I'm a 30 year Full Time resident of Alpine Meadows, CA. I have carefully reviewed this Gondola Project DEIR that is being proposed for the Squaw Valley/Alpine Meadows area. Here are some of the basic problems and concerns that I can see from the information presented in the DEIR.
- 0013-2 |
 - Ecologically sensitive areas surrounding the gondola area. This needs to be more fully described and evaluated.
- 0013-3 |
 - Disturbing sites by blasting, heavy equipment, ATV, helicopters, trucks, people, etc. What are the plans, impacts, and more specifically, how are you going to mitigate existing residents short- and long-term.
- 0013-4 |
 - Sensitive Alpine plant species in the area. Where are the mitigation plans?
- 0013-5 |
 - Wildlife corridor area. Where is the information that specifically relates to all the habitat loss, and wildlife that would be greatly affected by having their existing corridors annihilated?
- 0013-6 |
 - Since there is heavy-use of Five Lake Trails during summer months, how is this addressed?
- 0013-7 |
 - Visual Impact to Bear Creek Homeowners, most of the streets above Mineral Springs, Snowcrest and Upper Bench Road. There are limited discussion relating to the visual impacts upon residents in these area.
- 0013-8 |
 - The constant and heavy use of noise equipment during construction period, and then running during operational periods is not thoroughly discussed nor mitigated.
- 0013-9 |
 - Safety Issue during high wind conditions. Please discuss thoroughly the type of tram systems and operational procedures that would be in place during high wind conditions.
 - Cumulative Impacts with Mid Terminal for Caldwell or new home sites being proposed. Why isn't this discussed.
- 0013-10 |
 - Public Safety/Hazards
- 0013-11 |
 - Why isn't the Alpine Meadows General Plan being updated, by Placer County Officials? Don't you think that it would be relevant to have an update Plan, since its outdated (i.e., 1968), prior to moving forward with this DEIR?
- 0013-12 |

0013-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0013-2, Alternatives (A)

Biological resources are addressed in Sections 4.12, "Vegetation," 4.13, "Botany," 4.14, "Wildlife and Aquatics," and 4.15, "Wetlands," in the Draft EIS/EIR. No specific reasons are provided as to how these issues are not more fully described and evaluated. Therefore, a further response cannot be provided.

0013-3, Resources Protection Measures/Mitigation Measures (RPM/MM)

These issues are addressed in the Draft EIR, for example, in Sections 4.7, "Transportation and Circulation," 4.9, "Noise," and 4.10, "Air Quality." Resource Protection Measures (RPMs) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. All RPMs relevant to reducing environmental impacts are identified in the discussion of each impact. The Mitigation Monitoring and Reporting Program prepared for the project (included in the Final EIS/EIR) identifies all the RPMs and mitigation measures that would be implemented as well as the timing and responsibility for each measure.

0013-4, Resources Protection Measures/Mitigation Measures (RPM/MM)

See responses to Comment 0013-3, above regarding RPMs and mitigation plans. Sensitive plants, and relevant RPMs and mitigation to protect sensitive plant species are addressed in Draft EIS/EIR Section 4.13, "Botany."

0013-5, Wildlife and Aquatics (W&A)

Effects on wildlife, and wildlife movement corridors are addressed in Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Specifically, see the discussion under Impact 4.14-6 for Alternatives 2, 3, and 4, which addresses disturbance or

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loss of wildlife movement, wildlife corridors, and native wildlife nursery sites.

0013-6, Recreation (R1)

See Section 4.1, "Recreation," in the Draft EIS/EIR. Specifically, see the discussion of "Dispersed Recreation Experience" under Impact 4.1-1 that addresses impacts on the Five Lakes Trail during project construction.

0013-7, Visual Resources (VR)

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives. These 21 visual simulations were created from a selection (16) of representative locations, which were initially selected from hundreds of viewpoints evaluated. Five of these (one site along Alpine Meadows Road, two sites at the Alpine Meadows base terminal, and two sites along Squaw Valley Road), experience widely varying conditions between the winter and summer months. They are also visible to a greater number of people traveling along the roads or from the base terminal. As a result, these five viewpoint locations were simulated during both winter and summer conditions, which resulted in the creation of a total of 21 visual simulations for each alternative. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view of the project from all possible locations in the project area; therefore, not all locations could be, or were required to be, simulated for the purposes of this EIS/EIR. Instead, highly frequented or prominent public areas and visually sensitive vistas were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. The viewshed analysis accurately accounts for topographic features, but does not incorporate potentially obscuring features such as vegetation or built structures. It is expected that existing vegetative screening would have the effect of considerably reducing the overall potential visibility of the project, dependent on the specific location and vantage of the viewer. Because it does

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not take into account potentially obscuring features, the viewshed analysis is a conservative approximation of the Zone of Potential Visibility. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0013-8, Noise (N)

Noise impacts are addressed in Section 4.9, "Noise," of the Draft EIS/EIR. Impacts 4.9-1 and 4.9-2 describe the project's construction noise impacts, and Impacts 4.9-3 and 4.9-4 describe the project's operational noise impacts. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. No specific reasons are provided as to how these noise issues are not thoroughly discussed or mitigated. Therefore, a further response cannot be provided.

0013-9, Public Safety (PS)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

0013-10, Cumulative Effects (CE)

Cumulative effects of the project in connection with other probable future projects (including the proposed White Wolf Development) are evaluated in Sections 4.1 through 4.17 in the Draft EIS/EIR.

0013-11, Public Safety (PS)

See Section 4.6, "Public Safety," in the Draft EIS/EIR.

0013-12, Alternatives (A)

No specific issues related to the content, analysis, or

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conclusions in the Draft EIS/EIR are raised in this comment.
No further response is warranted.

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0013-13 | The US Forest Service needs to be an active participant in the utilization of forest service lands. The proposed tram route cuts through Granite Chief Wilderness Designation as well as the popular Five Lakes Trail which is heavily accessed during the summer months. How in the world will this project mitigate the effects of this traverse?

0013-14 | Alpine Meadows is heavily populated with deer, coyotes, bears, beavers, mountain lions, bobcat, numerous birds, etc. Most of the above large mammals and large animals can be seen on any given day during the summer and winter months. There are several rather large pristine lakes that are located throughout Alpine Meadows. Wildlife will be heavily impacted during construction of this gondola. Please discuss further in the DEIR, and demonstrate that no effect will occur upon the existing populations of these animals.

0013-15 | Many homeowners built their homes with visual views of the Granite Chief Wilderness area, Five Lakes Basin and Five Lakes Trail. With the gondola so visible on a ridgeline it would have a negative effect upon these homes and their subsequent resale value. A thorough economic impact assessment should be completed by the County and US Forest Service to demonstrate that no effect would occur.

0013-16 | Many homes are owned by second homeowners, who specifically bought property in Alpine Meadows for "peace and quiet" within this valley. Most are heavily used during the summer months for that reason, Peace and Quiet. For the reason, noise during construction would absolutely ruin most of the neighbor's time to enjoy a hike or walk around during the day time hours in the valley. Noise during the operation would severely impact the Wilderness area. We are now currently impacted by the Gazex Avalancher that seems to be operational during all hours of the day by Alpine Meadows. Are more of these planned in conjunction with this project? If so, how many are being proposed? What will happen with the habitat corridor due to all the excessive noise from the gondola?

0013-17 | Alpine Meadows is surrounded by high vistas and wonderful mountain ranges. Having a gondola filled with people looking down on their homes during the middle of the day, seems rather odd to me. A fine example would be the funitel at Squaw Valley that runs alongside many homes, going to the upper mountain.

0013-18 | Residents in Alpine Meadows are now being faced with several proposals moving forward that relate to massive residential developments in this small community. The Village at Squaw Valley, The Roller Coaster, White Wolf Development, The Alpine Sierra, The Stanford Chalet, along with Tahoe City new hotel, are a few of these developments. From a standpoint of cumulative development, what effect will all of these developments have on the region?

0013-19 | It is difficult to keep up as Placer County – again, why has the County not updated the Alpine Meadows General Plan, with all of this planned growth moving forward? Without a current and updated General Plan, it is difficult for anyone to sufficiently analyze impact. Additionally, how does the County's Climate Action Plan fit into the context of building of this new gondola?

0013-20 | I have direct concerns with the use of heavy equipment, trucks, ATVs on Forest Service-managed land or private land for that matter during a high flammable fire season. We have experienced a tremendous

0013-13, Resources Protection Measures/Mitigation Measures (RPM/MM)

Impacts related to the GCW and the Five Lakes Trail are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," respectively, in the Draft EIS/EIR. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. These are also included in the MMRP, which is part of the Final EIS/EIR and includes timing and responsibility for each measure.

0013-14, Wildlife and Aquatics (W&A)

See Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Resource Protection Measures (RPMs) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. There is no obligation under NEPA or CEQA that a project have no effect on a particular resource; however, significant effects must be mitigated, and under CEQA, feasible mitigation must be implemented to attempt to reduce significant impacts to less than significant levels. The RPMs and mitigation measures in the EIS/EIR achieve these standards. No specific suggestions are provided in the comment that would guide inclusion of further information/discussion in the EIS/EIR. Therefore, further response cannot be provided.

0013-15, Socioeconomics (S1)

The extent to which the project would, or would not, have an effect on visual resources is documented and depicted in Section 4.2, "Visual Resources" and simulated through the inclusion of 63 photo-simulations presented in Appendix D. The analysis of visual impacts for the project did not specifically correlate or assess the anticipated impacts of the project to property values. The project, if approved, would extend the extent of visible ski area infrastructure, which is presently evident within the surrounding landscape. While some viewers may perceive this to present a potential negative effect on property values, others may deem the added connectivity of the two ski areas, as proposed, as having a potential positive impact on property values.

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It is also important to note that Section 4.5, "Socioeconomics and Environmental Justice" was included in the Draft EIS/EIR as a requirement of NEPA, not CEQA, as CEQA does not address these issues. Section 4.5.2.2, "Effects Analysis and Significance Criteria" lays out the analytical indicators that were used to guide analysis in this section, and does not include property values of homes near the project area as an analytical indicator guiding analysis. Instead, effects analysis in Section 4.5, "Socioeconomics and Environmental Justice" was conducted through the lens of potential effects of the project on population, employment (part-time seasonal employment vs. full-time equivalents), Town/County tax revenue, tourism and visitor spending, and the project's compliance with Executive Order 12898, Environmental Justice. As such, an economic assessment of the project's potential impacts on the property values of homes near the project area was not conducted.

0013-16, Noise (N)

The comment is concerned with noise disturbance during construction and operation of the project. Noise impacts are addressed in Section 4.9, "Noise," of the Draft EIS/EIR. Impacts 4.9-1 and 4.9-2 describe the project's construction noise impacts, and Impacts 4.9-3 and 4.9-4 describe the project's operational noise impacts. Resource Protection Measures (RPM) have been incorporated into the project and mitigation measures have been recommended for all significant and potentially significant impacts. No specific reasons are provided as to how these noise issues are not thoroughly discussed or mitigated. Therefore, a further response cannot be provided.

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Potential noise effects on wildlife and effects on wildlife movement corridors are addressed in Draft EIS/EIR Section 4.14, "Wildlife and Aquatics."

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0013-17, Other (O2)

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0013-18, Cumulative Effects (CE)

Cumulative effects are addressed in the Draft EIS/EIR in Sections 4.1 through 4.17. The projects identified in the comment are included in Section 3.5, "Cumulative Effects Analysis Methodology," and were considered in the cumulative analysis in the Draft EIS/EIR.

0013-19, Land Use (LU)

Placer County recognizes the Alpine Meadows General Plan is dated. The County endeavors to update general plans as staffing and resources allow. In the interim, the current plan is the plan of record and was appropriately utilized within this analysis. Please refer to Section 4.4.1.2 "Regulatory Setting" in the Draft EIS/EIR for further information.

The Placer County Sustainability Plan, commonly referred to as the Climate Action Plan, has not yet been approved. As such, an analysis of the project's consistency with the Sustainability Plan is not appropriate or required. The methodology for assessing the anticipated effects that the gondola would have on greenhouse gas emissions and climate change is provided by the Placer County Air Pollution Control District. Please refer to Section 4.11, "Greenhouse Gas Emissions and Climate Change" in the Draft EIS/EIR for further information.

0013-20, Public Safety (PS)

See Section 4.6, "Public Safety," in the Draft EIS/EIR. Specifically, see the discussion under Impact 4.6-1, which describes hazards (including wildfire hazards) associated with project construction, operation, and maintenance. RPM HAZ-4 would specifically address wildfire hazards and would be

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included as a required component of the project by the Forest Service and the County.

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0013-20
cont'd

amount of fires in Northern California, many of which have largely been out of control, due to overgrowth of vegetation. What type of precautions would the County take to control a fast moving fire caused by the construction or operation of this equipment.

0013-21

Does it make any sense to add this gondola going over one of the most scenic ridgelines and then add to the already congested traffic mess that we now face on a daily snow day in Alpine Meadows? Does it not make sense to solve the traffic problems first - that most of residents at Squaw Valley/Alpine Meadows have, before moving forward with a gondola being constructed? Traffic studies should be done on a busy day during the most heavily-utilized winter days, not random days during the year.

0013-22

There are a lot of empty buses running up and down Alpine Meadows during peak ski periods. Doesn't it not make sense to spend more money on upgrading the current buses, and regulate the time of those buses, so that more individuals can be accommodated, and moved off of existing roads? The County owes the residents of both Alpine and Squaw Valley more time to consider and study ways to eliminate traffic coming from out of the region.

0013-23

I also find Exhibit 4.5-3 Placer County Median Household Income and Percentage of Population misleading. I would assume most of Squaw Valley Full Time employees are not making \$73,948 as a median income and that the poverty level for this area is well below the 8.9% figure shown on page 238. Many people that I know work two or three jobs to be able to live in the Tahoe area.

I sincerely hope that these issues will be considered and addressed.

Sincerely,



Mary Bennett
1280 Mineral Springs Trail
Alpine Meadows, CA 96146

0013-20 cont'd, Public Safety (PS)

0013-21, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Potential impacts to scenic resources are addressed in Section 4.2, "Visual Resources," in the Draft EIS/EIR. The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." Section 4.7.2.1, "Methods and Assumptions," provides a detailed description of the methodology used for the traffic impact analysis. As described therein, peak winter visitation was utilized in the analysis to ensure that the project's transportation impacts were not understated.

0013-22, Transportation and Circulation/Traffic and Parking (T&C/T&P)

Section 2.3.2.1 of the Draft EIS/EIR evaluates an "Improvements to Existing Shuttle System Alternative." See the Master Response above on this topic, in Section 1.8, "Master Responses," for more information on the Improvements to Existing Shuttle System Alternative.

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation."

Regarding service by Tahoe Area Rapid Transit Service (TART) to Alpine Meadows, please see response to comment 0144-36 describing the difficulties associated with providing this service. However, Placer County is continuing to promote improved transit service in the project region through implementation of the "Systems Plan Update for the Tahoe Truckee Area Regional Transit in Eastern Placer County."

0013-23, Socioeconomics (S1)

The comment provides an opinion regarding the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a specific response is not warranted. It is noted that data provided in Exhibit 4.5-3 is included to provide indicators of the general conditions and environment within the county in which the project would occur.

0014

Will Hollo

From: Derik Benson/USA <Derik.Benson@cushwake.com>
Sent: Friday, May 18, 2018 2:13 PM
To: Scoping Comments
Subject: California Express Gondola - Please Support

"Dear USFS/Placer County:

0014-1

I support the California Express Gondola because it is a great amenity to the area and will help the ski resorts remain viable and compete in the challenging ski resort industry. I have skied Squaw and Alpine for the last 4 decades and hope to see this happen to improve the skiing experience. I am also an avid hiker, biker, and outdoorsman and see no negative long term impact with the construction of the Gondola. I hope you will support it.

Thanks,
 Derik

Derik Benson
 Managing Director
 CA License #01182654

Direct: 408-436-3670
 Mobile: 408-568-0325
 Fax: 408-615-3444
derik.benson@cushwake.com



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0014-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

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0015

Will Hollo

From: Steven Benton <stevebenton56@me.com>
Sent: Tuesday, June 5, 2018 8:40 PM
To: Scoping Comments
Subject: Support for the Squaw Alpine gondola

Hi,

0015-1 | My family and I support the building of the gondola to connect Squaw Valley and Alpine Meadows ski area. We are homeowners in Truckee and ski in these mountains in the winter and hike and bike in them during the summer and fall. The gondola would improve utilization while reducing road traffic between the two base areas.

Best regards,

Steve Benton

0015-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

0016-1

From: Roxanne Beverstein <roxanne@c4media.com>
Sent: Tuesday, May 22, 2018 4:24 PM
To: Scoping Comments
Subject: No to the Gondola from Squaw Valley to Alpine Meadows

0016-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0017

Date submitted (Pacific Standard Time): 6/11/2018 8:48:19 PM
First name: Marc
Last name: Blakeney
Organization:
Title:
Official Representative/Member Indicator:
Address1: 16900 placer oaks rd
Address2:
City: Los gatos
State: CA
Province/Region:
Zip/Postal Code: 95033
Country: United States
Email: Marcwlegette@yahoo.com
Phone: 4083588505
Comments:

0017-1 |

The proposed alignment of the Squaw to Alpine gondola is bad. The proposal needs to be scrapped and start from scratch with a chairlift that has a much lower footprint. This is a pristine high alpine environment that must be considered with value in the decision making process.

I oppose the proposal.

Marc

0017-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 6/10/2018 1:11:14 PM
 First name: Maya Tracy
 Last name: Borhani
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: P.O. Box 969
 Address2: P.O. Box 969
 City: 4070 N. Lake Blvd.
 State: CA
 Province/Region:
 Zip/Postal Code: 96140
 Country: United States
 Email: gmcmaya@gmail.com
 Phone: 3602985866
 Comments:

Dear Foresters, Legislators, Planning Commissioners, and related organizational and local representatives,

0018-1 | This proposed project is ridiculous and detrimental to the ongoing environmental quality and and diversity of the Lake Tahoe basin and surrounding mountain watersheds.

The EIR clearly states that there are numerous problems with this proposed project, ALL of which will deleteriously and severely impact this national treasure of Lake Tahoe.

THE EIR IS EXTREMELY FLAWED as a result.

0018-2 | Although the proponents claim that they care about Tahoe -- the environment and the culture-- clearly they don't even KNOW Tahoe culture or care about the environment here, or they would be more concerned about the impacts of this project. For example, one or more of the towers for the proposed gondola will stand precariously close to the Granite Chief Wilderness Area (a FEDERALLY protected wilderness area; WHY DESIGNATE THESE if we are going to turn around and endanger them by placing DEVELOPMENTS too close to these areas to significantly make a difference? This is my primary concern: placing towers (and the CONSTRUCTION required to make that happen) SO CLOSE to a federally designated and PROTECTED wilderness area is simply irresponsible, not to mention flagrantly in violation of the point of federally protected wilderness areas. In addition, the little frog that is endangered that lives in the headwaters of the American River that are in this area are two more reasons NOT to construct or develop ANY projects ANYWHERE NEAR the Granite Chief Wilderness.

0018-3 | What year is this? Have we not learned that we CANNOT CONSTRUCT near HEADWATERS of ANY river, and expect the environment to maintain its quality let alone to survive in its current pristine state. THIS IS UNACCEPTABLE. THERE IS NO REASON WHATSOEVER to develop near headwaters or to endanger this already endangered species list frog.

0018-4 | This project should be DENIED based on this extremely flawed EIR. NONE of the suggested alternatives are any better: ALL OF THEM RISK CRITICALLY ENDANGERING this federally recognized, pristine, currently UNDEVELOPED wilderness area.

And to that final point: One of the reason people go to a WILDERNESS AREA is to enjoy WILDERNESS -- not to gaze out on concrete towers, nor to see a gondola going by overhead, or even in the distance. THE POINT OF WILDERNESS AREAS is to get away from the hustle and bustle of civilization, as well as from PEOPLE, and all the trapping of development that this proposed (and ridiculously stupid) gondola will bring to our pristine Tahoe wilderness.

THIS EIR IS EXTREMELY and FUNDAMENTALLY FLAWED. A true EIR would reflect how inappropriate this project is for this particular location, and for the Tahoe basin and watersheds in general. EVEN the proposed "alternative" options are equally flawed (in one way or another) and do NOT reflect the point of an EIR, to honestly and thoroughly reflect the environmental risks of a project. This EIR tries to excuse away all the problems and flaws, even in the so-called alternative solutions.

0018-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project. The comment summarizes opinions regarding the Draft EIS/EIR that are addressed in more detail in subsequent comments. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0018-2, Wilderness (W2)

Impacts related to the Granite Chief Wilderness are addressed in Section 4.3, "Wilderness," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0018-3, Wildlife and Aquatics (W&A)

Impacts related to the Sierra Nevada yellow-legged frog are addressed in Section 4.14, "Wildlife and Aquatics," in the Draft EIS/EIR. Impacts related to hydrology and water quality are addressed in Section 4.17, "Hydrology and Water Quality." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0018-4, Opinion (O1)

The comment does not provide specific reasons specifying why the Draft EIS/EIR is flawed. As noted in the previous comment, impacts related to wilderness are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR; impacts related to hydrology and water quality (including watersheds) are addressed in Section 4.17, "Hydrology and Water Quality."

The comment also states that the alternatives are flawed, but does not provide specific reasons for this assessment. Chapter 3, "Approach to the Analysis," of the Draft EIS/EIR describes the NEPA and CEQA requirements for environmental analyses, including alternatives analyses. The Draft EIS/EIR is a public disclosure document to ensure environmental factors

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are considered during the agencies' decision-making process. The alternatives analysis provided in the Draft EIS/EIR is adequate for the purposes of NEPA and CEQA.

0018

0018-4
cont'd

THIS PROJECT will NEVER be right for Tahoe, or Granite Chief Wilderness Area, and therefore should NOT EVER BE BUILT.

Sincerely,
Maya Borhani

0018-4 cont'd, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0019

Date submitted (Pacific Standard Time): 5/22/2018 2:48:41 PM
 First name: Petra
 Last name: Borhani-Bakker
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: 10512 E Alder Creek Rd
 Address2:
 City: Truckee
 State: CA
 Province/Region:
 Zip/Postal Code: 96161
 Country: United States
 Email: pborhanibakker@gmail.com
 Phone: 3602980976
 Comments:
 To Whom It May Concern:

0019-1

At a time when I am still fortunate enough to see wild, protected lands in an area held so dear to my and other's hearts, I can only cringe at the thought of a purely unnecessary gondola breaking its way through the majestic, protected Granite Chief Wilderness. The Five Lakes hike is my absolute favorite trail in the North Lake Tahoe/Truckee area. When you wind your way up its steep ascent and curve through the granite boulders and moss covered trees it forces you to embrace the wild place we're lucky to call home. Away from the noise of traffic and machines, you're quickly enveloped into a truly unique piece of land.

I urge you to listen to the environmental impacts this proposed gondola will have on a PROTECTED wildness area. The risk to water quality danger to native frog species and other animals, and intimately the truly unnecessary damage the project will cause upon the land. There will no longer be serenity and quite on the Five Lake trail, instead there will be a constant whirring and clicking of a gondola passing overhead. Please, in a time where citizens feel more and more powerless, please help us protect the Granite Chief wilderness and tell KSL that a gondola is not needed.

If Tahoe turns into a Vail due to companies like KSL being permitted to construct indoor water parks and base to base gondolas, I ask you, why do any of us live here? We live here for the wild and scenic beauty of the Sierra Nevada mountains, for the community that stands up to big corporations trying to destroy local treasures, and we live here because we're proud to protect what is vulnerable; we are proud to be active citizens in a beautiful place.

For the sake of my children who are yet a fleeting thought, I beg you to deny KSL the opportunity to ruin a local treasure. I dream of walking my children and their children up the Five Lake trail, and I urge to you allow that dream to flourish and come true.

Thank you for your time and consideration.

Sincerely,
 Petra Borhani-Bakker

0019-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The comment references several environmental impact topics that are evaluated in the Draft EIS/EIR; wilderness is addressed in Section 4.3, "Wilderness"; recreation and trails are addressed in Section 4.1, "Recreation"; water quality is addressed in Section 4.17, "Hydrology and Water Quality"; Sierra Nevada yellow-legged frog is addressed in Section 4.14, "Wildlife and Aquatics"; and noise is addressed in Section 4.9, "Noise." The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Date submitted (Pacific Standard Time): 6/3/2018 3:28:26 PM
 First name: David
 Last name: Bourke
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 Title:
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 Comments:
 Comments on Squaw Valley Alpine Meadows Base to Base Gondola EIR EIS

0020-1 | Upon reading the Draft EIS EIR for the the Squaw Alpine Base to Base Gondola Project it is clear that Alternative 2 will have dramatic negative impacts on the scenic quality of Alpine Meadows, create avoidable negative impacts related to avalanche control, significantly diminish the quality of skiing at Alpine Meadows, and be the least effective at transporting skiers between the two bases.

0020-2 | The granite cliff band, upon which the gondola is proposed to be built, is the most beautiful and dramatic scenic resource in the Alpine Meadows valley. It is no wonder that Congress intended for it to be included in the Granite Chief Wilderness. Currently this ridge line shows no impact of human activity, and it is striking in its beauty. Alternative 2, with its numerous towers and unloading station, will transform this scenic treasure into an eyesore.

0020-3 | Having lived in Alpine Meadows for over twenty years, and Alta, Utah before that, I am very accustomed to the impact of avalanche control work. The sound of explosives in the morning is usually a welcome event, knowing that we have fresh snow. The recent installation of Gazex devices has somewhat changed that. The concussive force created by the Gazex blasts impacts our home in a way that hand charges did not. The blasts shake the house, and I am worried that seals on my dual pane windows will be broken as a result. Alternative 2 will require more Gazex installations, and therefore increase the negative impact of avalanche control work on the residents of Alpine Meadows.

0020-4 | Having skied at over 60 ski areas in North America and Europe, I can honestly state that Alpine Meadows can provide some truly amazing skiing. One of the things that makes Alpine Meadows so amazing is the area around Bernie's Buttress. Currently this area is access by a long traverse that includes a little hiking/sidestepping. This situation maintains the high quality of skiing in this area. Not only does it keep the area from being a mogul field, but also people who make the effort to ski here will ski fall line all the way to the parking lot, even knowing that they will have to walk or skate back to the lift. This allows uncut powder to be skied days after a storm. Unfortunately Alternative 2 will unload people from the lift a the top of Bernie's Bowl. This will not only turn this southeast facing slope into a bump field, but also, having made no effort to get there, most of the skiers will not ski straight down to the parking lot, because they will have to do a little skating at the bottom. Instead they will make a few turns and then start traversing to the base of the lift, thereby turning Pond Slope into a series of random traverse lines and utterly ruining the skiing experience for those who have been enjoying this area for decades. In this way the skiing experience in Alpine Meadows will be significantly diminished by the installation of the Base to Base Gondola as proposed under Alternative 2.

0020-5 | The ridge line proposed for the Gondola under Alternative 2 is very exposed to the wind. It is highly likely that the gondola will frequently not be able to operate due to high winds. The location of the other alternatives will be less exposed to the wind. Because of this, Alternative 2 will be the least effective at transporting people between the two bases.

0020-1, Summary (S2)

The comment provides a summary of detailed comments provided below. See responses to the detailed comments below.

0020-2, Visual Resources (VR)

Impacts related to the GCW are addressed in Sections 4.2, "Visual Resources," and 4.3, "Wilderness," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0020-3, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0020-4, Recreation (R1)

Implementation of Alternative 2 may change the current pattern of skiing within the Bernie's Bowl terrain; in particular, terrain that is currently accessed exclusively via hiking/sidestepping would be more easily accessible for gondola passengers unloading at the Alpine Meadows mid-station under Alternative 2. However, due the beneficial recreational impacts to ski area facilities anticipated to occur with implementation of any of the action alternatives, this potential change to the Bernie's Bowl terrain would not have the effect of altering the overall NEPA or CEQA effects conclusions as listed in Section 4.1, "Recreation" of the EIS/EIR.

Please refer to the text within Impact 4.1-1 (Alt. 2) in the Final EIS/EIR, below sub-header "Ski Area Facilities and Recreation Experience," for a description of impacts that may occur to skiable terrain within *the Buttress* and *Bernie's Bowl* areas as a result of implementation of Alternative 2.

0020

0020-5, Alternatives (A)

Wind closures would be implemented as necessary to ensure safe operation of the gondola. Extensive consideration of wind directions and velocities was included in the planning of each alternative evaluated, and many potential alternatives were ultimately eliminated from detailed analysis because of these considerations. Specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives.

Please refer to Section 2.3 of the Draft EIS/EIR for a discussion of alternatives and design components that were considered but not evaluated further (as well as a discussion of why these alternatives and design components were eliminated from detailed analysis in the Draft EIS/EIR).

0021

Date submitted (Pacific Standard Time): 6/5/2018 12:12:56 PM
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Last name: Bridges
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Title:
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Address2:
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State: CA
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Country: United States
Email: steve96158@excite.com
Phone: 408 453-2367
Comments:

Opposed to proposed gondola construction in middle of designated wilderness area due to undesirable and incompatible accompanying side effects: negative impact on views, increased traffic, increased litter and trash, increased disturbance of and negative impact on important wildlife areas, etc. Opposed to private use of public lands for financial and private compensation purposes. Irreversible impacts: once it gets started it can never be taken back and restored to original undisturbed and undamaged use.

0021-1, Opinion (O1)

Impacts related to wilderness, views, traffic, recreation, wildlife areas, and irreversible impacts are addressed in various sections of the Draft EIS/EIR. Although the comment raises concerns regarding these environmental topic areas, no specific issues related to the analysis or conclusions in the Draft EIS/EIR are raised.

0021-1

0022

June 10, 2018

Shirlee I. Herrington
 Environmental Coordination Services
 Placer County Community Development Resource Agency
 3091 County Center Drive, Suite #190
 Auburn, CA 95603
 530-745-3132
 Email to Placer County: cdraecs@placer.ca.gov
 Email to Forest Service: comments@squawalpinegondola-eis.com

Subject: Comments on the Draft EIS/EIR for the proposed Squaw Valley | Alpine Meadows Base-to-Base Gondola Project, released 4/27/18

Dear Placer County & National Forest Service,

As a homeowner in Alpine Meadows for 19 years, I respectfully submit my comments on the Draft EIS/EIR for the proposed Squaw Valley/Alpine Meadows Gondola Project.

0022-1

I am dismayed by the Draft EIS/EIR analysis. Many issues raised by me and others in response to the 2016 request for comments seem to have been dismissed in the Draft EIS/EIR as not significant or in conflict with the objective. In particular, the public requested in 2016 that a well-thought out alternate land-based, low-emission transportation service be evaluated, and that such land-based service be compared to the proposed gondola service in terms of impact to the visual scenery, air and water environment, noise pollution and enjoyment of the Granite Chief Wilderness. The Draft EIS/EIR has dismissed the land-based alternative, concluding that it does not meet the purpose and need of the project, and justifies this by saying that usage of the existing shuttle service has been low. As identified in the Draft EIS/EIR, the existing service has long waiting periods, of up to 30 minutes, so it is not surprising that usage is low. It is clear that KSL wants a Gondola in order to maximize their profits, and so the County and Forest Service have catered to KSL and concluded that a land-based service doesn't meet the purpose.

0022-2

As stated in the documents, the overall purpose of the project is to enhance the visitor wintertime experience at both Squaw Valley and Alpine Meadows by providing direct connection between the ski areas for more convenient access to skiable terrain and resort amenities.

I ask the Forest Service and the County how do they determine that enhancing the convenience of a subset of skiers is more important than the experience of hikers on the Five Lakes Trail (5LT) and in the Granite Chief Wilderness (GCW)? Said another way, is improving the convenience of skiers who want to use two resorts on the same day worth the visual and noise pollution that will be created for those who want to enjoy the 5LT and GCW? It is unfathomable to me that the Forest Service who should be preserving our natural areas is supporting this development in order to provide a slight convenience to a small number of skiers.

0022-3

The EIS/EIR concludes that the Gondola Project will have a significant and unavoidable impact on:

1. Visual Character of the area
2. Construction Noise – impacting hikers, residents and users of the GCW
3. Caltrans Intersections & Highways

0022-1, Alternatives (A)

See the Master Response related to the Improvements to Existing Shuttle System Alternative provided above in Section 1.8, "Master Responses." Strong indicators of impact differences between the action alternatives (Key Issues) are discussed in Section 2.4.1 of the EIS/EIR.

0022-2, Purpose and Need (P&N)

This Final EIS/EIR is intended to provide objective analysis of the resource impacts that are anticipated to occur as a result of the project. Rationale specifically related to how the project would or would not meet the project's identified Forest Service purpose and need is provided in the Record of Decision (ROD); Placer County's decision on how the project would or would not meet the project's identified CEQA project objectives will be made by the Placer County Board of Supervisors. Project approval or denial or based off of this rationale is provided in the ROD.

0022-3, Purpose and Need (P&N)

The comment summarizes the project's significant and unavoidable impacts, and questions why the purpose and need for the project should outweigh these significant and unavoidable impacts. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; California Code of Regulations [CCR] Section 15093).

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Similarly, the Forest Service's Record of Decision provides rationale related to whether this project would meet the project's identified Forest Service purpose and need (with consideration of the project's significant and unavoidable impacts).

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0022-3
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Why should the County and Forest Service accept these significant and unavoidable impacts on an area that is a national treasure? The EIS/EIR concludes that Alternative 1 (No Action) is the environmentally superior alternative, but that Alternative 1 would not meet the basic project objectives related to providing a connection between the Alpine Meadows and Squaw Valley base areas or providing a more efficient and safer avalanche control system. The Draft EIS/EIR is essentially saying that this project has significant and unavoidable impacts, but if we don't do it, we can't achieve the objective of connecting the resorts. Why is this objective worth these significant and unavoidable impacts?

0022-4

It is interesting that a more efficient and safer avalanche control system is being linked to the Gondola. If that is the objective, then the County and Forest Service could easily put forth a proposal for the Gasex exploders without the Gondola. I would also like the County to explain to the public what the rules are to obtain approval to install Gasex exploders. Approximately 8 of these Gasex Exploders have been installed in Alpine Meadows within the last year, and I am not aware of any EIR or opportunity for public comment before these very large, ugly devices were installed with concrete platforms and above ground piping. If there is no EIR required, then the County and Forest Service can choose to satisfy their desire for this avalanche control system without linking them to the Gondola Project.

0022-5

The EIS/EIR clearly violates the spirit of several plans and policies designed to maintain the visual beauty of the Sierra Nevada. Technicalities are used to dismiss these violations. Here are several examples (underlining added by me):

1. The Placer County General Plan Policy 1.K.1 calls for development to not be located along ridgelines and steep slopes.
 - a. The EIS/EIR says that Alternative 4 does not present a potential inconsistency because the gondola would not traverse the ridgeline but would briefly pass over the ridgeline.
 - b. Does the County think that the public they represent would agree with this conclusion?
2. The Squaw Valley General Plan prohibits buildings of more than 35 feet.
 - a. The EIS/EIR says that the Gondola towers (some over 50 feet) do not violate this height limit because they are towers and do not have exterior walls like a building.
3. Scenic Routes: The EIS/EIR says that the project is in proximity to SR 89 and Squaw Valley Road, both of which were designated as scenic routes in the 1977 Placer County General Plan Scenic Highway Element. The goal for scenic routes in the Placer County General Plan is to "develop a system of scenic routes serving the needs of residents and visitors to Placer County and to preserve, enhance, and protect the scenic resources visible from these scenic routes" (Placer County 2013).
 - a. The EIS/EIR concludes that this is not a problem as "... SR 89 is an eligible route for designation as an official scenic highway but is not yet officially designated."
 - b. Would the voters agree that we should impair the scenic highway because it has not yet been designated as such?
4. Per the EIS/EIR, "The overarching Goal [of Placer County General Plan Policy] 1.K for visual and scenic resources in the Placer County General Plan is to "protect the visual and scenic resources of Placer County as important quality-of-life amenities

0022-6

0022-7

0022-8

0022-3 cont'd, Purpose and Need (P&N)

0022-4, Other (O2)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0022-5, Visual Resources (VR)

CEQA requires only that inconsistencies with general plan goals and policies be identified and discussed (CEQA Guidelines, §§ 15125, subd. [d]). The Draft EIS/EIR does this (please refer to Draft EIS/EIR, pp. 4.2-23 thru -24). Further, Policy 1.K.1 was not adopted as a threshold of significance under CEQA, so it does not dictate a new significant impact finding as to Impact 4.2-1 (Consistency with Federal, State and Local Regulations). Thus, a new significant impact finding is not warranted under CEQA.

The Final EIS/EIR has been updated to further clarify that all alternatives would be, to a certain degree, inconsistent with Placer County General Plan Policy 1.K.1 which states: "The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

- a. Avoids locating structures along ridgelines and steep slopes;
- b. Incorporates design and screening measures to minimize the visibility of structures and grated areas;
- c. Maintains the character and visual quality of the area."(Placer County General Plan, p. 39)."

By their very nature, gondolas and ski lifts must extend along steep slopes to achieve their purpose. Given that the gondola is intended to connect the two ski resorts, all three action alternatives must also cross over the ridgeline which separates the two valleys. As such, it is not possible for the gondola to avoid slopes and ridgelines, but rather the design must rely on other means to screen and minimize the visible impacts of the

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infrastructure. Specifically the design of each alignment takes advantage of existing topography and vegetation to shield views as well as incorporates design standards via RPMs SCE-1, SCE-2, SCE-4, SCE-7, SCE-8, REV-1, and REV-3. It is acknowledged that the Alternative 2 alignment traverses a lengthy distance of the sparsely vegetated ridgeline, whereas Alternatives 3 and 4 cross over the ridgeline in one discrete location before diving down into Catch Valley, thus limiting the visible impacts of the Alternative 3 and 4 gondola infrastructure to a greater extent than under Alternative 2. With these design measures in place, all three gondola alignments achieve consistency with the goals and policies of Policy 1.K.1.

0022-6, Visual Resources (VR)

This policy in the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) is addressed in the EIS/EIR under Impact 4.2-1 for all alternatives. In particular, please refer to page 4.2-24 through 4.2-25 of the Draft EIS/EIR, which indicates that Alternative 2 would not create any inconsistencies with the height restrictions established for buildings in Section 137 of the SVGPLUO. This is because the gondola towers that would exceed the height limit do not fall into the category of the structures that are defined in Section 137 of the SVGPLUO. In particular, the gondola towers would not include exterior walls touching the natural grade and as such are not bound by this restriction.

0022-7, Visual Resources (VR)

The EIS/EIR concludes that potential inconsistencies with management direction provided for designated scenic routes, as designated in the 1977 Placer County General Plan Scenic Highway Element, are not possible because no restrictive management direction can be applied to eligible routes like SR 89. The protections afforded by the California Scenic Highway Program, which directs management of California's designated scenic routes, only apply to officially designated scenic routes.

0022-8, Visual Resources (VR)

Per the definition of the VQO of *Partial Retention* provided in the VMS, management activities (or in this case, infrastructure

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related to operation of the gondola) must remain visually subordinate to the characteristic landscape. Compliance with this Forest Plan designated VQO is determined by whether proposed activities and infrastructure are visually subordinate to the characteristic landscape or visually dominate the original characteristic landscape. Visually dominating activities are consistent with the less restrictive VQO of *Modification*.

Please refer to Section 4.2.2.1 of the Draft EIS/EIR for further information.

0022-8
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for County residents and a principal asset in the promotion of recreation and tourism” (Placer County 2013).”

- a. The relevant policies intended to carry out this goal include: “maintains the character and visual quality of the area.”
- b. The EIS/EIR concludes that “While Alternative 4 would constitute an incremental addition to the built environment in the upslope areas at Alpine Meadows, the presence of gondola infrastructure and Gazex facilities would not dominate the characteristic landscape in these areas and therefore would not constitute an inconsistency...”
- c. Do we have to dominate the landscape with development before we have failed to maintain the character and visual quality of the area?

0022-9

5. Cumulative Impact: The EIS/EIR states: “Visual impacts associated with Alternatives 3 and 4, when combined with General Development in Olympic Valley and Alpine Meadows, would lead to an unsubstantial cumulative impact because Squaw Valley and Alpine Meadows have already experienced considerable ski area development. Similarly, when visual impacts associated with Alternatives 3 and 4 are combined with the White Wolf project, there would be unsubstantial cumulative impacts...”

- a. This essentially concludes that because we keep approving development, any one development does not substantially impact the area.
- b. This completely ignores the spirit of the required cumulative impact analysis.
- c. Placer County and the Forest Service have prepared a 794 page Draft EIS/EIR but failed to recognize what is obvious to the concerned public – that approval of the following projects in the Alpine Meadows/Squaw Valley area will have a material adverse impact on peaceful enjoyment, natural beauty, and ultimately even property values in this area:
 - i. Squaw Village development
 - ii. Gondola Project
 - iii. Alpine Sierra Development
 - iv. Gasex Exploders, which have already created an unsightly view along Alpine Meadows Road
 - v. White Wolf

0022-10

6. The Alpine Meadows General Plan says:

“The *Alpine Meadows General Plan* serves as a master plan for future growth at the ski area. It includes plans for conservation, economics, housing, land use, public buildings, public services and facilities, recreation, and other plans relating to future development of the area. General goals, objectives, and procedures of the *Alpine Meadows General Plan* that are relevant to visual resources in the project area include the following (Placer County 1968): Maintain the open, natural, mountain-recreation character. All aspects of the vast, unique and outstanding physical beauty of the area must be consciously and continuously preserved.”

- a. The EIS/EIR says “While this language does not establish any concrete standards that must be adhered to and instead offers recommendations for maintaining the quality of visual resources at the ski resort, it makes clear that maintenance of the area’s stunning visual character is a priority for the managers of Alpine Meadows.”
- b. Unfortunately, the Alpine Meadows General Plan is not referenced again in the EIS/EIR analysis, presumably because there are not concrete standards.

0022-11

7. The EIS/EIR analyzes 21 viewsheds to evaluate the visual impact.

0022-8 cont'd, Visual Resources (VR)

0022-9, Visual Resources (VR)

The Draft EIS/EIR concludes that there would be an unsubstantial cumulative impact under Alternatives 3 and 4 because visual impacts associated with those alternatives would be considered to constitute an incremental or additive visual impact on the project area, and would not constitute a drastic change to the existing built environment within the project area.

For Alternative 2, however, the cumulative effects analysis in Section 4.2.4.2 states that, “Visual impacts associated with Alternative 2, when combined with the White Wolf project, could lead to an adverse cumulative impact.”

The Draft EIS/EIR also concludes that adverse impacts of some magnitude would occur for Alternatives 2, 3 and 4 with regard to Impact 4.2-2: Visual Character. Many of the adverse and significant impacts identified by the comment were disclosed in Section 4.2.3 (Direct and Indirect Environmental Consequences).

0022-10, Visual Resources (VR)

The comment is correct that the Alpine Meadows General Plan was not incorporated further in the effects analysis of Section 4.2, “Visual Resources” because no concrete standards are provided. However, the project’s consistency or inconsistency with other relevant planning documents which do contain concrete standards is analyzed in detail for all alternatives within Impact 4.2-1: Consistency with Federal, State, and Local Regulations. Please refer to Impact 4.2-1 for all alternatives for further discussion.

0022-11, Visual Resources (VR)

As stated in Section 4.2.2.1 of the Draft EIS/EIR, the Viewpoint Analysis conducted for this project allowed for a qualitative analysis of the visuals changes anticipated to occur with implementation of any of the action alternatives from a selection of 16 representative locations. The scope of the Viewpoint Analysis is inherently limited in this way, as all locations with potential visibility of the proposed gondola could

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not be visually simulated for the purposes of this EIS/EIR; as such, highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation.

However, viewpoints 3 and 4 (along Chalet Road) are intended to be representative views from the Alpine Meadows subdivision. Please refer to those views in Appendix D of the EIS/EIR for all alternatives to view the anticipated visual impacts of the project for Alpine Meadows residents.

0022-11
cont'd

- a. But the analysis does not include the viewshed of Alpine Meadows residents. How can this not be a highly relevant viewshed?

0022-12

Regarding impact on the GCW area, the EIS/EIR concludes the following regarding the preferred Alternative 4:

"Alternative 4 on its own has the potential to result in a reduction to opportunities for solitude or primitive and unconfined recreation, which is characterized as an adverse effect. When added to this adverse effect, the effects associated with the Caldwell property development discussed above (the potential for an increased likelihood of visitor encounters and visual impacts for users of the National Forest System-GCW) would result in a cumulative adverse effect to opportunities for solitude or primitive and unconfined recreation within the National Forest System-GCW."

Why accept a cumulative adverse effect on the recreation of those who enjoy wilderness areas in favor of slight convenience for a subset of skiers?

0022-13

I recommend that Placer County and the Forest Service find a way to poll the users of Lake Tahoe on this Gondola and to recognize that there are many concerned constituents who simply don't have the time or expertise to study a 794 page Draft EIS/EIR which realistically requires dedicated legal support to review and identify the flaws in the analysis.

0022-14

As a skier at Alpine Meadows and Squaw, a hiker of Five Lakes trail and GCW, a homeowner in Alpine Meadows and a defender of our natural spaces, I ask the County and Forest Service to do the right thing and conclude that Alternative 1 should be the chosen alternative.

Sincerely,
Judy Bruner
judybruner@outlook.com

Mailing Address:
14072 Okanogan Drive
Saratoga, CA 95070

Alpine Meadows Address:
1751 John Scott Trail
Alpine Meadows, CA 96146-9765

0022-11 cont'd, Visual Resources (VR)

0022-12, Recreation (R1)

The goal of the EIS/EIR is to provide clear and data-driven analysis of impacts that could occur to individual resources so that the decisionmakers have the most accurate and up-to-date data with which to make findings and to make a decision regarding approving, conditioning or denying the project.

The question of whether or not the project's adverse effects (NEPA) or significant impacts (CEQA) are worth accepting in light of the project's benefits resides with the respective decisionmakers (i.e., Forest Service Supervisor and Placer County Board of Supervisors) and is not within the purview of the EIS/EIR document.

Please refer to the Draft Record of Decision and the decision provided by the Placer County Board of Supervisors for this project, which provide detailed rationale from the decisionmakers on how the project would or would not meet the project's identified Forest Service purpose and need and CEQA project objectives.

0022-13, NEPA/CEQA Process (NCP)

Both NEPA and CEQA require, and allow for, numerous opportunities for the public to provide comments throughout the environmental review process. These comments help to guide the development of alternatives and the environmental analysis. Such opportunities include the public scoping process which occurs when the notice of intent (under NEPA) and notice of preparation (under CEQA) are published, formal public comment period after the release of the draft environmental document, as well as public hearings. These public input processes are described in detail in Chapter 6, "Consultation and Coordination," of the Draft EIS/EIR. The Executive Summary provides a summary of the document, including a brief overview of the project, alternatives, and the results of the environmental analysis. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0022

0022-14, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Will Hollo

From: Bryce Thayer <thayerbryce@gmail.com>
Sent: Friday, May 18, 2018 2:35 PM
To: Scoping Comments
Subject: California Express Gondola

0023-1 | This is such a great idea! Please make this happen! I know that Squaw Valley and everyone involved has the ability to do this in a way that respects nature, please make this a reality

Thanks

Jonathan
Bryce
Thayer

(352) 427-1822

0023-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0024

Date submitted (Pacific Standard Time): 6/11/2018 10:43:08 PM

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Last name: Buffington

Organization:

Title:

Official Representative/Member Indicator:

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State:

Province/Region: CA

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Phone: 5304120849

Comments:

0024-1

I would like to express my strong support for Alternative 1, the No Action Alternative for the Squaw Valley to Alpine Meadows Base to Base Gondola. As a frequent user of the Five Lakes Trail and the Granite Chief Wilderness Area in the Five Lakes basin, I find that Alternative 2, 3 and 4 would each adversely affect the dispersed recreation experience to an unacceptable degree. The possibility of Alternative 2 is especially alarming because it "would change the visual characteristics of the scenery surrounding the Five Lakes Trail, resulting in a long-term impact to the recreation experience". The eastern most lake in the Five Lakes Basin (which is a gorgeous place that provides a very special and unspoiled wilderness experience) and what is now named Barstool Lake, would be especially impacted by Alternative 2 as "gondola infrastructure would be particularly noticeable along the high ridgeline that separates that Caldwell property from the National Forest System- GCW".

Living full time in Alpine Meadows for over 30 years has allowed me to develop a very strong connection to the Granite Chief Wilderness Area and to frequently enjoy "the experience of remoteness and primitiveness" that this beautiful and unspoiled area provides.

0024-2

Although I am an avid skier, the benefits of the Base to Base Gondola project in Alternative 2,3 or 4 do not come close to justifying the adverse affects that the project would have on the Granite Chief Wilderness Area. I am concerned for the water quality, wildlife, and vegetation in the area and I urge The US Forest Service and Placer County to fully support Alternative 1, the No Action Alternative to this project in order to protect the special wilderness quality of this gorgeous natural, unspoiled area.

Thank you for respecting and maintaining the special wilderness designation that the Granite Chief Wilderness Area enjoys by not approving the Base to Base Gondola.

0024-1, Other (O2)

Impacts related to the wilderness and recreation/trails are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0024-2, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

It is also important to note that none of the proposed gondola alignments would traverse the National Forest System-Granite Chief Wilderness (GCW). While the gondola would cross through a portion of the congressionally mapped GCW under Alternative 2, it would cross only through private lands located within the congressionally mapped GCW (in particular, through a 54.6-acre portion of the privately owned Caldwell property). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, these land use restriction do not apply on private lands. Please refer to Section 4.3, "Wilderness" of the Final EIS/EIR for further information.

0025

Troy Caldwell
P.O. Box 1784
Tahoe city, Ca. 96145

Heather Beckman
Placer County Planning Service Division
775 North Lake Boulevard
Tahoe City, Ca. 96145

0025-1, Opinion (O1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0025-1

Dear Ms. Beckman,

Thank you for the opportunity to comment on the Squaw Valley Alpine Meadows Base-to Base Gondola project DEIR.

This is to reinforce the conclusions for the use of the gasex for the project Health and Safety.

In clarification of the 105mm Howitzer military weapon shrapnel, more than just rock fragments are produced from the impact. The projectile explodes into many pieces of razor sharp metal and have been found up to one half mile from the target zone. As a military weapon these shrapnel pieces can cause severe injuries and or death. The elimination of as many of these shots as possible, from my point of view, not only protects the Gondola system but the people in or around the area in the time of the shooting.

Sincerely,



Troy Caldwell

0026

Shirlee Herrington

From: Tom Carter <tfcarter@gmail.com>
Sent: Sunday, June 10, 2018 8:59 AM
To: Placer County Environmental Coordination Services
Subject: Gondola comments

Environmental Coordination Services,

0026-1

Please do not approve the SquawAlpine gondola plan.

The proximity to The Granite Chief Wilderness should be cause enough to scrap the proposal. Limit this type of development. It is not the path we should take. Let's be reasonable and preserve whatever we can of the unique mountain environment.

Cheers,

Tom Carter

0026-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0027

Date submitted (Pacific Standard Time): 6/6/2018 9:46:05 AM

First name: John

Last name: Casaudoumecq

Organization:

Title:

Official Representative/Member Indicator:

Address1: P.O. Box 592

Address2:

City: Tahoe City

State: CA

Province/Region:

Zip/Postal Code: 96145

Country: United States

Email: john.casaudoumecq@gmail.com

Phone: 646-258-9832

Comments:

My family and I enjoy skiing at Alpine Meadows and Squaw Valley. We also enjoy hiking in the area of both. We think the owners, to date, have done a good job improving upon what they purchased. We do not believe the benefits of a village to lodge connection come even close to what will be lost after it is made. It creates an eyesore through an important and beautiful area. It creates the opportunity to use Alpine Meadows as a parking area for Squaw Valley through the busy periods of the winter season, without considering the risks. We like things as they are and hope that the USFS leaves them that way.

0027-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project. Potential impacts related to traffic and visual resources are addressed in Sections 4.7, "Transportation and Circulation," and 4.2, "Visual Resources," of the Draft EIS/EIR. In particular, the traffic analysis in the Draft EIS/EIR includes an analysis of parking and changes in traffic patterns and parking use between Apline Meadows and Squaw Valley with implementation of the proposed Gondola. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0028

Date submitted (Pacific Standard Time): 6/11/2018 3:31:55 PM
First name: Madona
Last name: Casini
Organization:
Title:
Official Representative/Member Indicator:
Address1: 926 Country Club Dr
Address2:
City: Tahoe City
State: CA
Province/Region:
Zip/Postal Code: 96145
Country: United States
Email: Madona@casini.us
Phone: 530-386-6112
Comments:

0028-1 |

This land is a sanctuary for many, a place to escape. Please do not build a gondola around or any where near. The human footprint is by far the biggest problem we face for ruining special sacred places left like this. Make the right decision based on what is best for the environment and not business. Our future depends on it.

0028-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0029

Date submitted (Pacific Standard Time): 6/5/2018 3:41:53 PM
 First name: Sharla
 Last name: Chador
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: 1329 Pine Trail
 Address2: PO Box 2212
 City: Olympic Valley
 State: CA
 Province/Region: CA
 Zip/Postal Code: 96146
 Country: United States
 Email: menlovechador@gmail.com
 Phone: 7072920929
 Comments:
 U.S. Forest Service, Tahoe National Forest, Truckee Ranger District, NEPA Contractor,

0029-1

Thank you for the opportunity to comment on this very important issue. I am a homeowner and full time resident of Alpine Meadows for the last 13 years. Over the years my family and I have hiked the Five Lakes trail and accessed Granite Chief Wilderness every single month of the year, on January 1, and on the 4th of July, depending on the snow pack. I have hiked this trail easily a thousand times, just as I did today. Were you in one of the helicopters flying the gondola line between Squaw and Alpine today, June 5th? If you so?, maybe you saw me, on the trail below.

I love this trail. I am not alone. You have a solid understanding of the vast number of people who make the strenuous climb to Five Lakes in hopes of experiencing the wild? freedom and connection? to nature that society has helped us lose. Please don't take this from us, from our children, and from future generations?, we need it now more than ever.?

0029-2

??T?he stunning landscape in the photo attached is? the site of the proposed gondola's mid-way station?, can you imagine? Even the project's most environmentally superior route would have 33 adverse environmental impacts on important Tahoe values; including traffic, loss of wildlife habitat, and destruction of the unique Sierra experience the Forest Service calls "solitude or primitive unconfined recreation." In addition, residents would be subjected to? additional? deafening gasex explosions. ?A?sk yourself for what??

In the words of Albert Einstein, Look deep into nature, and then you will understand everything better. ???If you have experienced this area on foot, you know it is soul stirring, a respite from the noise, a calming connection. Don't allow it to be destroyed.

Respectfully,
 Sharla Menlove Chador
 Alpine Meadows Resident

0029-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0029-2, Opinion (O1)

The comment notes that the environmentally superior alternative (Alternative 4) would have 33 adverse environmental impacts. Table 2-3 in the Draft EIS/EIR summarizes the impacts of all the alternatives, and the comment is correct in that Alternative 4 would result in 33 NEPA conclusions of adverse effect, as shown in this table. However, many of the CEQA conclusions for the same impacts are less than significant with mitigation, meaning that these impacts can be reduced below thresholds of significance with implementation of mitigation measures identified in the Draft EIS/EIR. In fact, the only significant and unavoidable impacts associated with the project include impacts to visual resources (Impact 4.2-2), impacts on vehicular queuing at Caltrans intersections (Impact 4.7-4), cumulative traffic impacts (Impacts 4.7-11 through 4.7-13) and construction noise impacts (Impact 4.9-1); these are summarized in Section 5.2.1, "Significant Environmental Effects that cannot be Avoided," of the Draft EIS/EIR.

The Gazex avalanche mitigation system, which was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

0030

G. Braiden Chadwick
 bchadwick@mitchellchadwick.com
 916-462-8886
 916-788-0290 Fax

June 11, 2018

VIA U.S. MAIL AND ELECTRONIC MAIL

Placer County Community Development Resources Agency
 3091 County Center Drive, Suite 190
 Auburn, CA 95603
 Attention: Shirlee Herrington, Environmental Coordination Services
 Email: cdraecs@placer.ca.gov

Re: Comments on the Squaw Valley Alpine Meadows Base-to-Base Gondola Project DEIR

Dear Ms. Beckman:

0030-1 | My client, Troy Caldwell, appreciates the opportunity to comment on the April 2018 Draft Environmental Impact Report (“DEIR”) prepared for the Squaw Valley Alpine Meadows Base-to-Base Gondola Project (“B2B Project”), pursuant to the California Environmental Quality Act (“CEQA”). Mr. Caldwell strongly supports the B2B Project and believes it will be a positive amenity for the community. The information provided below is intended to clarify and correct certain information contained in the DEIR regarding Mr. Caldwell’s property.

0030-2 | As noted in the DEIR Environmental Setting section on page 4.1-1, Mr. Caldwell owns private property bordered on one side by Squaw Valley and on the other side by Alpine Meadows (the “Caldwell Property”). The Caldwell Property holding is 460 acres, which should be reflected in Table 3-3 on page 3-14 of the DEIR. While addressed in the DEIR, we also reiterate that Mr. Caldwell’s property is private property and is not part of the Granite Chief Wilderness Area (“GCWA”).

0030-3 | In sum, the Wilderness Act of 1964 (the “Wilderness Act”) does not extend, and has never extended, to private property. The California Wilderness Act of 1984 (the “California Act”) was passed along with 116 other subsequent laws designating wilderness around the country. While the California Act boundary lines included private lands, these private lands were only proposed for purchase at the time they were drawn and were never included in the wilderness designation. This “potential purchase line” encompassed approximately 60 acres of the Caldwell Property. Importantly, the Wilderness Acts do not impose wilderness restrictions on private property, nor do they impose any land-use restrictions where a private individual is unwilling to sell. Therefore, as outlined below, the GCWA does not include Mr. Caldwell’s private property.

{00034551;4 }

0030-1, Other (O2)

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft EIS/EIR. Therefore, a response is not warranted.

0030-2, Wilderness (W2)

Table 3-3 has been updated to note that the size of the Caldwell Property is 460 acres.

0030-3, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness" as it pertains to legislation related to wilderness designation. No further response is provided.

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Page 2

0030-4, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness" as it pertains to the significance of wilderness designation on private lands contained within or adjacent to designated wilderness areas. No further response is provided.

0030-4

I. The Wilderness Act and the California Wilderness Act do not Apply on Private Property

The Wilderness Act and the California Act do not impose wilderness-area designation or land-use limitations on privately-owned property, including the Caldwell Property. When designating wilderness areas, Congress was scrupulous in protecting the rights of private property owners within mapped wilderness boundaries. A portion of the Caldwell Property is included within the mapped boundary of the GCWA as shown in the map on page 1-6 of the DEIR; however, that does not make the Caldwell Property wilderness or preclude any proposed private uses on the property.

A. The Wilderness Act applies only to federal lands.

The Wilderness Act explicitly states that its land-use restrictions only apply to publicly-owned *federal lands*. Specifically, the Wilderness Act provides that:

[T]here is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by the Congress...no Federal lands shall be designated as 'wilderness areas' except as provided for in this chapter or by a subsequent Act.¹

The Wilderness Act defines "wilderness area" as "an area of undeveloped federal land retaining its primeval character and influence."² Thus, the Wilderness Act only applies to federal lands designated as wilderness areas. Since the Caldwell property is neither, the Wilderness Act does not apply to it.

Privately-owned parcels within designated wilderness areas are not subject to the land-use constraints of the Wilderness Act.³ Instead, the Secretary of Agriculture ("Secretary") is authorized to acquire those lands to include within the wilderness area, but only if the land owner agreed.⁴ Unless the private land is conveyed to the United States, landowners retain all of their property and development rights.⁵

B. The California Act is also limited to federal lands.

Congress, in establishing the GCWA, designated certain lands within the Tahoe National Forest. The National Forest is comprised of federal land reserved for national forest purposes but similar to the Wilderness Act, does not extend to private land. As with its counterpart, the California Act

¹ 16 U.S.C. § 1131(a).

² 16 U.S.C. § 1131(a), underline added.

³ 16 U.S.C. § 1134.

⁴ 16 U.S.C. § 1134(c).

⁵ 16 U.S.C. § 1134 (a) & (b).

{00034551;4 }

0030

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Page 3

0030-4 cont'd, Wilderness (W2)

0030-4
cont'd

guaranteed inholding owners rights of ingress and egress to access their properties, authorized the Secretary to negotiate for acquisition of private properties from willing sellers, and provides for the purchase of privately-owned lands with the concurrence of the owner.⁶

The Department of Agriculture's Roadless Area Review and Evaluation of 1979 ("RARE II") confirms that the California Act did not intend to extend the land-use constraints of the Wilderness Act to private lands. RARE II was the process by which the wilderness areas were identified and designated. The Final Environmental Statement issued as part of the RARE II process confirmed that "non-Federal lands included within the boundaries of an area classified as wilderness are not themselves classified . . . Wilderness designation in itself imposes no restrictions on use of the private lands within or adjacent to wilderness."⁷ The location of Mr. Caldwell's private property adjacent to GCWA, by itself, does not impose any land-use restrictions.

II. The Mapped Wilderness Designation Area is Inaccurate

0030-5

In enacting the California Act, Congress mapped out wilderness designation areas and specifically drew the boundaries to include private property that it thought the Secretary might eventually acquire. At the time that Mr. Caldwell purchased the Caldwell Property in 1989, the Secretary made an offer to purchase a portion of his property in the pre-drawn "designation area." However, Mr. Caldwell was not a willing seller, and thus the property remained private.

Following Mr. Caldwell's refusal to sell his property, and the three-year⁸ allowance in the California Act to purchase private property, Congress never enacted legislation to change the map of GCWA to accurately reflect the wilderness lands. The current map still includes the "potential purchase line" extending approximately 60 acres onto the Caldwell Property as shown in the map on page 1-6 of the DEIR. Thus, the boundary line as currently drawn exists only as a legal fiction since it is located on Mr. Caldwell's private property. While the Caldwell Property is within the boundary, it is not wilderness, and is not managed as wilderness. To be clear, the existence of a wilderness boundary line on adjacent private lands does not provide for protection or management of those private lands as wilderness. To truly designate land as wilderness, the federal government must own the land.

Furthermore, Congress did not intend for the Wilderness Act to create protective perimeters or buffer zones around each wilderness area. Non-wilderness activities are not precluded up to the

⁶ Pub.L.No. 98-425 § 103(a) & (c) (wilderness areas are to be administered pursuant to the Wilderness Act, which preserves the right of ingress and egress to private inholdings at 16 U.S.C § 1134(a)) (both the Act and California Act require that the owner of a privately-held parcel must agree to the transfer, thereby precluding exercise of eminent domain)).

⁷ Final Environmental Statement 78-04, RARE II (January, 1979) at p. 73, underline added.

⁸ Pub.L.No. 98-425 § 103(c) (Such exchange shall to the maximum extent practicable be completed within three years after the date of enactment of this title).

(00034551;4 }

0030-5, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to the discussion of development buffer zones around designated wilderness areas. In particular, many wilderness bills enacted after the Wilderness Act of 1964 prohibit the establishment of development buffer zones around designated wilderness areas (please refer to Section 4.3, "Wilderness," for further information). No further response is provided.

0030

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0030-5
cont'd

boundary of the wilderness area. Congressional intent on the matter is further shown through language in the California Desert Protection Act: "Congress does not intend for the designation of wilderness areas ... to lead to the creation of protective perimeters or buffer zones around any such wilderness area."⁹ The GCWA "potential purchase line" on Mr. Caldwell's property, or on the boundary between the Caldwell Property and federal land, does not create any sort of buffer.

III. The GCWA Line Located on the Caldwell Property is not Precise

0030-6

Finally, a legal description and boundary map were prepared for the GCWA in the mid 1980's. The metes and bounds of the legal description were not included; and, it appears that the legal description was prepared from line work overlaid on a United States Geological Survey Quadrangle Map, and not based upon a field survey. The "potential purchase line" on the accompanying map is approximately 250 feet wide due to the large scale of the map and the thick line drafted. The thickness of the line can be seen in Exhibits 2-4 and 2-5 on pages 2-7 and 2-8 of the DEIR. Presumably, a more accurate map and legal description would have been prepared for purchase of the private property. These factors further emphasize that the Caldwell Property is not subject to the management and land-use restrictions of the GCWA.

We understand that the County is concerned about accuracy and properly depicting the boundaries of the GCWA. As explained herein, the wilderness line depicted on the Caldwell Property is misleading since wilderness designations do not extend to private property. (See DEIR Exhibit 4.3-1.) Thus, the line should be removed from depictions of the Caldwell Property in the DEIR. However, if the County insists on including the misleading wilderness line on the Caldwell Property, then the County must include notations that make the delineation of the true wilderness boundary obvious in its map exhibits.

Best regards,

MITCHELL CHADWICK LLP



G. Braiden Chadwick

cc: Troy Caldwell

⁹ Pub.L. 103-433 § 103.

{00034551;4 }

0030-5 cont'd, Wilderness (W2)

0030-6, Wilderness (W2)

The comment affirms the content of Section 4.3, "Wilderness," as it pertains to discussion of the fact that the Caldwell property is privately owned and therefore not subject to the management and land use restrictions of imposed by the Wilderness Act of 1964.

Adequate analysis of impacts that may occur to the National Forest System-GCW necessitate that the line identified by the comment (i.e., the "potential purchase line" that distinguishes the National Forest System-GCW from the private lands within the congressionally mapped GCW) be included in all depictions of the Caldwell property contained within the Final EIS/EIR. It is important that these lands be clearly distinguished from National Forest System-GCW lands in this analysis so that proper historical context can be provided regarding the evolution of land use management in the area.

No further response is provided.

0031

Will Hollo

From: Justin Chatten-Brown <justincb@gmail.com>
Sent: Friday, May 18, 2018 1:01 PM
To: Scoping Comments
Subject: California Express Gondola

Dear USFS/Placer County:

0031-1 | I support the California Express Gondola because I think it will significantly decrease the traffic and environmental impact for those wishing to move between Squaw and Alpine Meadows.

Thanks for your time,

Justin

Justin Chatten-Brown, MD
justincb@gmail.com

0031-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Shirlee Herrington

From: dropbox <dropbox@cornew.com>
Sent: Monday, May 21, 2018 8:41 AM
To: Placer County Environmental Coordination Services
Subject: Support for Squaw Valley California Express

Dear Forest Service and Placer County:

0033-1 | Please approve the Squaw Valley California Express project.

Not only will it improve the skiing experience, it will have a minimal negative effect on the environment, but will help with traffic and with the viability of the business' in the area. An underutilized ski resort is of greater per capita impact than a properly operated efficient destination.

Thank you,

Dan Cornew
410 Indian Trail
Olympic Valley, CA. 96146

0033-1, Opinion (O1)

The comment is directed towards the project approval process and does not address the content, analysis, or conclusions in the Draft EIS/EIR. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

0034

Shirlee Herrington

From: Ken Crawford <fish1phish2@yahoo.com>
Sent: Tuesday, May 22, 2018 11:12 AM
To: Placer County Environmental Coordination Services
Subject: Gondola profest at SquawAlpine

0034-1 | I support the Gondola project. Currently the area uses 3 busses moving 6 times an hour; maybe moving as little as 3 customers or 150 depending on business. These busses use a tremendous amount of fuel creating lots of CO2. They also can sit idle in traffic for over an hour on busy days. I think people would prefer a nice scenic ride between the ares over sitting in traffic. with Please approve the project with one of the 3 alternatives.
Ken Crawford
Tahoma.

0034-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

Will Hollo

From: Chance Cutrano <ccutrano@gmail.com>
Sent: Monday, June 11, 2018 4:50 PM
To: Scoping Comments
Cc: cdraecs@placer.ca.gov
Subject: Draft EIS/EIS Comments for Squaw-Alpine Gondola

Greetings,

These comments are intended to inform the USFS and Placer County in their environmental review of all proposed alternatives for the Squaw-Alpine Gondola Proposal. I am not a Tahoe resident, but I do take numerous trips to Tahoe annually. As part of this ritual retreat to North Lake Tahoe, I spend several days in the untrammled wilderness of Granite Chief and Five Lakes. I've been fortunate enough to camp with friends and loved ones up near Five Lakes, watching the miraculous cotton candy-colored sunsets and star-gazing until the warm granite lulls me to sleep.



0035-1, Other (O2)

The issues identified in the comment are addressed in the Draft EIS/EIR in Sections 4.2, "Visual Resources," 4.3, "Wilderness," 4.14, "Wildlife and Aquatics," and 4.15, "Wetlands." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0035-2, Other (O2)

The potential environmental impacts of Alternatives 2, 3, and 4 are summarized in Tables ES-3 and 2-3 in the Draft EIS/EIR. While the project would result in impacts to the GCW (as described in Section 4.3, "Wilderness"), it would not result in 33 impacts to the GCW as stated in the comment, but rather would result in 33 impacts across numerous resource areas, of which wilderness is one. Other issues identified by the commenter, including impacts on Sierra Nevada yellow-legged frog, traffic impacts (including VMT generation), and air quality, are addressed in Sections 4.14, "Wildlife and Aquatics," 4.7, "Transportation and Circulation," and 4.10, "Air Quality," respectively, in the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

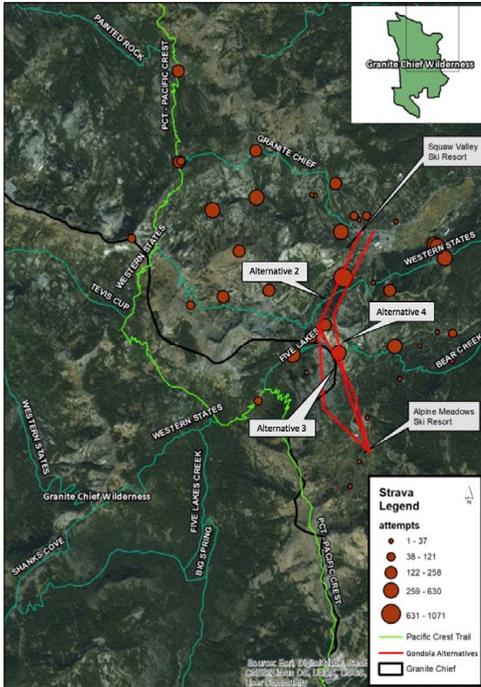
0035-1 I can't help but picture a landscape polluted with cable cars, metal wire ropes, and "exploders" when I hear about the plans proposed by KSL. These protected and legislatively designated wildlands are not part of some carnival, and therefore need not be scarred with a gondola, a carousel, a Ferris wheel, or any other tourist gimmick. I am wholeheartedly opposed the wrong-headed effort to build out a gondola from Squaw Valley to Alpine Meadows. I believe this encroachment on the tranquility of our wild public land is a detriment to wildlife, the character of the region, and visitor experience.

0035-2 It is my understanding that even the preferred alternative would cause 33 negative/adverse impacts to the greater Granite Chief Wilderness. Among these, I am most concerned about impacts on the endangered Sierra Yellow-Legged Frog, but also the long-term ramifications caused by new noise and air pollution. Studies have shown that traffic congestion is likely to increase due to this proposed development. Even if vehicles are to become more energy efficient over the next decade, how could Placer or the USFS support a project that will increase Vehicle-Miles-Traveled and Scope 3 Emissions for these ski resorts? The picture of 430+ more vehicles on those roads during busy weekend days is

0035

0035-2 | worrisome. Supporting such projects will not keep Tahoe Blue, it will perpetuate unsustainable (and unfashionable) growth in direct conflict with the goals of TRPA.

0035-3 | Additionally, I'm gravely concerned about the alternatives provided by the USFS and Placer. No alternative can rectify the obscene number of issues this base-to-base gondola will provide. For instance, a recent study conducted by researchers at Presidio Graduate School used social media sites to map visitation and use patterns in Granite Chief Wilderness. After controlling for non-PCT and non-event visitors, the map below, containing the proposed alternatives overlaid on top of the Strava visitation and use data (from the study conducted by Presidio students), shows that all alternatives will cause adverse impacts to individuals visiting Granite Chief Wilderness and particularly Five Lakes.



0035-4 | Finally, the originally proposed route proposed by KSL was found to be the most environmentally damaging route. How can Placer County and the USFS have faith that this corporation will operate in the best interest of the people of Tahoe, the American public that own Granite Chief Wilderness, or the land itself when their first proposal was so carelessly harmful to this unique and delicate ecosystem?

Please allow the American people the solitude and tranquility we were promised when we entrusted the USFS to manage and protect the greater Granite Chief Wilderness.

Chance Cutrano
Fairfax, CA 94930

0035-2 cont'd, Other (O2)

0035-3, Wilderness (W2)

Impacts related to the GCW and the Five Lakes Trail are addressed in Sections 4.3, "Wilderness," and 4.1, "Recreation," respectively, in the Draft EIS/EIR. These sections evaluate in considerable detail the impacts that would be anticipated to occur for individuals visiting the GCW and/or Five Lakes (which appears to be the commenter's concern in referencing the recent Presidio Graduate School study).

No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0035-4, Opinion (O1)

The purpose of the Draft EIS/EIR is to identify the potentially significant impacts of the project, and develop alternatives and mitigation measures that would reduce and/or avoid those impacts. Over the course of project planning, multiple field surveys were conducted (including focused biological surveys, cultural surveys, and noise measurements) and studies performed (including visual simulations, traffic studies, and air quality and greenhouse gas emissions modeling), the results of which led to the refinement of the project, development of alternatives studied, and the identification of Resource Protection Measures (i.e., mitigation measures). Based on the analysis of these data, it was determined that Alternative 2 would have several different, or more severe, environmental effects than Alternatives 3 and 4 (see pages ES-8 and ES-9 of the Draft EIS/EIR), and Alternative 4 was identified as the Environmentally Superior Alternative under CEQA, demonstrating that the environmental process was followed and has been effective.

The Forest Service and Placer County decision-makers will review and consider the environmental analysis as well as public comments received during the environmental process when making a decision regarding the project. As part of the County's project approval process, the project applicant would be required to adhere to various conditions of approval that are monitored by the County through a variety of permit processes as listed below.

0035

Development Review Committee Improvements Plan Approval
Improvements Construction Inspection Encroachment Permit
Final Map Recordation Acceptance of Project as Complete
Building Permit Approval

Further, the project applicant would be required to implement RPMs and mitigation measures included in the project's Mitigation Monitoring and Reporting Program (Appendix I to the Final EIS/EIR). Responsibility for ensuring that required RPMs and mitigation measures are implemented rests with the Forest Service and Placer County.

0036

Will Hollo

From: Warren Davis <warrendavis@gmail.com>
Sent: Friday, May 18, 2018 2:30 PM
To: Scoping Comments
Subject: CA Express

0036-1 | I am full in favor of this tram. It is not really wilderness to any true mountain person. In spite of the often disingenuous information from Squaw's management, I think this project should go forward.

Warren K. Davis
Truckee CA

0036-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0037

Date submitted (Pacific Standard Time): 5/15/2018 1:59:43 AM
First name: David
Last name: Doherty
Organization:
Title:
Official Representative/Member Indicator:
Address1: 11280 Star Pine Rd.
Address2: 11280 Star Pine Rd.
City: Truckee
State:
Province/Region: California
Zip/Postal Code: 96161
Country: United States
Email: soulskis@gmail.com
Phone: 5305836300
Comments:

I am against the proposed gondola project between Squaw Valley and Alpine Meadows. I am in agreement with the Forest Service study that the negative environmental impacts far outweigh any potential profits for Squaw Valley. Perhaps the 50 million investment for this gondola would be better spent on public transportation and reducing the detrimental effects of tourism.

0037-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. It is unclear what study is being referred to in the comment as the Forest Service has not conducted a study comparing the environmental impacts of the project to potential profits generated by the project. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0060

Will Hollo

From: Judi Gentry <judi.haven.gentry@gmail.com>
Sent: Tuesday, June 19, 2018 1:08 PM
To: Scoping Comments
Subject: Proposed Squaw Alpine net gondola

0060-1

My name is Judi Haven Gentry and I have been a Squaw Valley and Alpine resident since 1969!

I taught skiing for the Squaw Valley Ski School a long time ago and have hiked the Sierras in summer ever since. My favorite trail is the Five Lakes Trail that goes through the granite Chief Wilderness. I find it absolutely appalling that this area which has been designated Wilderness for us to enjoy is now compromised by a big-money development. It actually makes me sick when I hike the Five Lakes Trail to think of development going in on our most beloved area of the Wilderness. It is so easily accessible to residents of Alpine and to many many people who enjoy it from all over the world. It's a rare Jewel to be able to hike up to the lakes and sit there in total peace.

Now, once again, the big developers are trying to destroy an area we hold dear. We absolutely should not let them get away with it. When I was hiking the Five Lakes Trail last summer a helicopter flew over my head on the way to pick up a big load at the squaw side. It came back and flew with a huge load of something very heavy and the cable snapped as I was videoing the helicopter and it dropped the load not far from the Five Lakes Trail. Of course it could have killed me or anybody else on the trail but it dropped it in the forest just a few hundred feet from the trail. I still have the video. I also sent a copy of the video to the Sierra Watch people.

I respect their work so much but it is a little like a David and Goliath situation. The Sierra Watch people are fighting an almost unstoppable force of the big money corporation which has taken over our beloved Alpine Meadows and Squaw Valley ski resorts. That big corporation is also trying to destroy Squaw Valley by putting a huge building there with a water slide and rafting river INSIDE the enormous building!! We have the Truckee River we don't need a water slide! They should be stopped.

They are just trying to make more money in the summer season. But the impact would be huge.

This area between Truckee and Tahoe City should be preserved. It's very precious. The residents do not want a four-lane freeway going from Truckee to Squaw and that's about what it would take to handle all the extra traffic going to some kind of a Disneyland in Squaw. The Planning Commission has not been vigilant and has passed illegal measures without honestly considering the huge and damaging impact it would have on the area. Traffic is very congested now in ski season and on all holidays. The development would increase our traffic problem exponentially.

But in this letter, I am pleading with the Forest Service to do everything in its power to block the violation of the Granite Chief Wilderness area.

Thanks so much for being a protector of our wilderness areas.

Judi

Judi Haven Gentry
 415 317-0400

0060-1, Opinion (O1)

Impacts to the Granite Chief Wilderness area and the Five Lakes Trail are addressed in Section 4.3, "Wilderness," of the Draft EIS/EIR. Traffic impacts are addressed in Section 4.7, "Transportation and Circulation," of the Draft EIS/EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment.

The comment is directed towards the project approval process. All comment letters submitted during the Draft EIS/EIR public review period will be reviewed and considered by the Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

Will Hollo

From: Bill Downs <billdowns200@yahoo.com>
Sent: Saturday, May 12, 2018 1:05 PM
To: Scoping Comments
Subject: California Express Gondola

Dear USFS

0039-1 | I support the California Express Gondola because it enhances responsible use of public & private lands. As with many locals, I would like to ski Alpine Meadows more, but it's currently not that easy.

In the last 2 years, I've skied over 90 days at Squaw, but only 3 days at Alpine Meadows because it takes too long for me to get there and back. I live full time in Olympic Valley and have all of my stuff at Squaw. Getting to Alpine on the shuttle takes at least 40 minutes longer (from standing in front of the Funitel to standing in front of Summit). It's even worse when there's bad traffic or the shuttle is late or is full (@ 4:00). If I wanted to commute over an hour a day, I would have stayed in the Bay Area.

Let's let the people use their land.

Bill Downs

Sandy Way

Olympic Valley

0039-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0040

Will Hollo

From: Bill Downs <billdowns200@yahoo.com>
Sent: Saturday, June 9, 2018 4:31 PM
To: Scoping Comments
Subject: Gondola Comments

0040-1

It would be great to ski Granite Chief and Sherwood in the same afternoon. Driving between the two mountains does not make sense. Please make it easier to enjoy our National Forests and approve the gondola.

William Downs
Olympic Valley

0040-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0041

Date submitted (Pacific Standard Time): 5/12/2018 12:06:49 PM
 First name: William
 Last name: Downs
 Organization:
 Title:
 Official Representative/Member Indicator:
 Address1: 1261 Sandy Way
 Address2:
 City: Olympic Valley
 State: CA
 Province/Region: William Downs
 Zip/Postal Code: 96146-3248
 Country: United States
 Email: billdowns200@yahoo.com
 Phone: 6502707414
 Comments:
 Dear USFS

0041-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

I support the California Express Gondola because it enhances responsible use of public & private lands. As with many locals, I would like to ski Alpine Meadows more, but it's currently not that easy.

In the last 2 years, I've skied over 90 days at Squaw, but only 3 days at Alpine Meadows because it takes too long for me to get there and back. I live full time in Olympic Valley and have all of my stuff at Squaw. Getting to Alpine on the shuttle takes at least 40 minutes longer (from standing in front of the Funitel to standing in front of Summit). It's even worse when there's bad traffic or the shuttle is late or is full (@ 4:00). If I wanted to commute over an hour a day, I would have stayed in the Bay Area.

Let's let the people use their land.

0042

Shirlee Herrington

From: Theresa May Duggan <teemayduggan@gmail.com>
Sent: Thursday, June 07, 2018 5:25 PM
To: comments@squawalpinegondola-eis.com; Placer County Environmental Coordination Services
Subject: Comments for EIR/EIS for Squaw Valley Gondola

Dear Friends,

Re: EIR/EIS: Squaw Valley|Alpine Meadows Gondola

0042-1

I would like to express my thanks for your work on the this EIR/EIS. I attended several, if not all, of the public meetings held by the USFS and Placer County. I am satisfied the process has been credible. It has been open, transparent, informed, interactive and inclusive. I believe the two agencies were committed to an honest process and I believe that has been achieved.

I read technical documents and often find them wordy and obtuse, not easy for a lay person to understand. I have to sing your praises for the work done in the Executive Summary. (<https://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/squawvalleygondolaproject>) I found the summary understandable, clearly written and without bias.

First, I was impressed with the clarity of the objectives of the project.

From your document **ES.1.2.2 CEQA PROJCT OBJECTIVES:**

The project has the following objectives:

1. *Enhance the visitor experience at Squaw Valley and Alpine Meadows by providing easy, and potentially faster, interresort access to terrain and amenities at both ski areas.*
2. *Reduce visitor and resort shuttle system travel on roadways between the resorts.*
3. *Provide opportunities for skiers to offload at mid-stations to provide easier access to existing skiable terrain.*
4. *Provide a system where the gondola segment between the Squaw Valley base terminal and mid-station can operate independently from the remainder of the gondola so that this segment can potentially function as a ski lift if the remainder of the gondola is not operational because of weather, maintenance, or other factors.*
5. *Use a facility alignment that allows vehicles and equipment to reach gondola cabins from the ground to evacuate people from the cabins, if necessary, during an emergency situation.*
6. *Improve the efficiency and safety of the existing avalanche hazard mitigation program at Alpine Meadows that relies on explosives by adding an effective, alternative avalanche mitigation technology.*

After reading the objectives, I believe the correct conclusion is found:

*Therefore, overall, Alternative 4 is determined to have less of an adverse environmental effect compared to Alternative 3, and is considered to be the **environmentally superior alternative**. (Emphasis added)*

0042-1, Opinion (O1)

The comment recommends preparation and implementation of a traffic management plan to manage traffic along Squaw Valley Road, which is already included as Mitigation Measures 4.7-2 (for Squaw Valley Road and intersecting roadways) and 4.7-8 (for construction traffic) in the Draft EIS/EIR and required to be implemented by the project applicant.

The remainder of the comment provides an opinion regarding the merits or qualities of the project. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0042-1
cont'd

I support Alt 4 as the superior choice for the Gondola. I urge the USFS to jump on board Placer County's assessment.

Additionally, I would also like to say the **Table ES-3 Summary of Resource Topics with Impacts and RPMs and/or Mitigation Measures** is one of the best charts I've seen explaining the complexities of the required mitigation. I believe the creators of this chart know how to tell information! The issues are clearly defined in the **Resource Topics/Impacts** column and further explained as they relate to both **NEPA and CEQA** and exactly what **Environmental Effects are before Mitigation** are required. The next column clearly explains the **RPMs and/or Mitigation Measures** required/alternative. The final column **Environmental Effects after Mitigation (by Alternative)** again as it relates to **NEPA/CEQA** defines how required mitigation will reduce impacts often to less than significant for my choice: Alternative 4.

I also read the mitigation ideas as an opportunity for the community to weigh in with ideas on how to better improve the project. Like most projects in California, we understand traffic is a significant impact of the project. No one project creates the traffic we have, nor will one project solve the congestion we have. A **Construction Traffic Management Plan** is a start, **Traffic Management along Squaw Valley Road** (and adjacent intersections) is another as are all the other required mitigation measures.

Our traffic congestion is solvable, we must as a region commit to real mass transit solutions. I find Squaw Valley/Alpine Meadows to be a ready, willing and able partner to seek solutions. I urge our community, Placer County and the USFS to work with them to make this Gondola, something I first heard about in 1977 while riding a chair lift in Alpine, a reality. It is long overdue. And importantly, it meets the objectives of the proposal.

Alternative 4 meets the objectives of the project, is the reasonable environmental choice and the major impacts can be mitigation with thoughtful solutions.

Please move this project forward.

Thank you,

Theresa May Duggan

Theresa May Duggan
Community Organizer
PO Box 290
Tahoe Vista, CA 96148
530-546-7903 land line
530-386-0479 mobile
teemayduggan@gmail.com

0042-1 cont'd, Opinion (O1)

0042

0043

RECEIVED
JUN 11 2018
CDRA

Robert J. Durham, Jr.
1750 Village Road East, Unit 5127
Olympic Valley, California 96146
robertdurham@yahoo.com

June 7, 2018

0043-1, Opinion (O1)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.

Community Development Resource Agency
Environmental Coordination Services
Attention: Shirlee Herrington, Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, California 95631

re: Squaw Valley-Alpine Meadows Base-to-Base Gondola Project

Dear Ms. Herrington:

0043-1

I am a Squaw Valley homeowner and am in favor of the Squaw Valley-Alpine Meadows Base-to-Base Gondola Project. I am in favor of the project even though several Gazex avalanche exploders would need be installed if the project were approved. These devices remove the need for on-the-ground human avalanche control (a dangerous mission for the ski patrol) and are therefore potentially life-saving. While I would hear this equipment from may home, I still support the project.

The project is beneficial to the Squaw Valley-Alpine Meadows community and will reduce traffic vehicular traffic in the region

I believe the Environmental Impact Report ("EIR") provides a comprehensive assessment of the project and that the EIR supports the project.

Sincerely,



Robert J. Durham, Jr.

0044

Will Hollo

From: Chris Egger <christopher.j.egger@gmail.com>
Sent: Monday, June 11, 2018 12:46 AM
To: Scoping Comments
Subject: Squaw Valley Alpine Meadows Base-to-Base Gondola Project Draft EIS/EIR Comment

Concerning the proposed Squaw Valley Alpine Meadows Base-to-Base gondola I would like to note the following:

- Unfortunately, I have not had the time to review the 1577-page draft EIS/EIR in depth so please pardon any comments that are at odds with the document or if I fail to reference the location of something in the draft EIS/EIR.
- For reference, I am a life-long Squaw Valley and Alpine Meadows skier (28 years of skiing at the resorts), as well as a frequent (approx.. 1x/week June-September) visitor to the Granite Chief Wilderness, especially the Five Lakes area. In addition, one of my areas of professional research is environmental psychology, concerning how environments affect individuals, with a focus on some of the effects of spending time in natural environments. Proceeding from my work, I tend to be acutely aware of environmental disturbances.
- Concerning the impact of the proposed gondola on the Granite Chief Wilderness and the visitor experience to the wilderness I would like to note that I am adamantly opposed to Alternative 2, as the gondola would cross through the wilderness boundary—which is completely contrary to the idea of wilderness areas (as set forth by Congressional designations). The presence of the gondola on the Caldwell property (Alternatives 3, 4) would, in my professional opinion, in largely subtle ways, detract from the experience of hiking to Five Lakes. Namely, the presence of gondola towers, GazEx devices, overhead cables, additional large structures on nearby ridges, and the occasional (i.e., during maintenance periods) gondola cabins, are all discrepant with the “naturalness” (i.e., minimal presence of man-made objects) of the area. Furthermore, peer-reviewed research (including my own) indicates that (1) these objects are likely to attract the attention of visitors, and (2) this detracts from some of the beneficial effects of spending time in natural places. (I can’t recall if the draft EIS/EIR acknowledges these issues as adverse effects.)
- Concerning the impact of the proposed gondola on the visitor experience within the Squaw Valley resort boundaries, I believe that Alternatives 2, 3 & 4 all would have **adverse impacts that may have not been recognized in the draft EIS/EIR.**
 - Alternatives 2 & 3, with the gondola segment from the Squaw base to Squaw mid-station running on the North-West (i.e., Squaw Creek) side of the ridge which the KT chair roughly parallels (with the KT chair on the South-East side of the ridge) would primarily detract from the skier experience by: (1) Placing gondola towers along the “West Face” (including “West Face Alternates”) and “Chute 75” ski runs, thereby introducing visual and audible disturbances, as well as obstacles in the middle of ski slopes. Currently these runs/slopes occupy a large area within the ski resort that have no built infrastructure. (2) Potentially eliminating some ski runs in this area with the placement of gondola towers. More specifically, some of the “Nose Chutes” may no longer be skiable if towers are placed in the middle of them. (In the Summer of 2017 a GazEx was installed in the middle of another run off of the KT lift, significantly limiting options for skiing the run and introducing a new hazard which a skier may run into.) (3) The Squaw mid-station, would likely (it is difficult to tell based on renderings as to how much) interfere with the flow of skier traffic from the KT chair to the “Saddle” area.
 - Alternative 4 would primarily have an adverse effect on the skier experience insofar as the Squaw mid-station would, based on renderings and size descriptions in the draft EIS/EIR,

0044-1, Wilderness (W2)

While the gondola would cross the congressionally mapped Granite Chief Wilderness (GCW), it would cross only private lands located within the congressionally mapped GCW (more specifically, through a portion of the 54.6-acre portion of the privately owned "Caldwell property" that overlaps with the congressionally mapped GCW). While the Wilderness Act of 1964 establishes land use restrictions for federally owned lands within congressionally mapped wilderness areas, it does not establish land use restrictions for privately owned lands within congressionally mapped wilderness areas, nor does it establish development buffer zones on the lands surrounding federally owned lands within congressionally mapped wilderness areas. In other words, there are no development restrictions imposed by the congressionally mapped GCW on private lands. Please refer to Section 4.3, "Wilderness" of the Draft EIS/EIR for further information.

Regarding the potential for the presence of the gondola to detract from the experience of hiking to Five Lakes, the Draft EIS/EIR acknowledges that the action alternatives would result in adverse (Alternative 2) or minorly adverse (Alternatives 3 and 4) effects to the dispersed recreation experience on the Five Lakes Trail. For further information, please refer to Section 4.1, "Recreation," of the Draft EIS/EIR (see discussion provided under Impact 4.1-1 for Alternatives 2, 3, and 4). These impacts will be considered by the decision-makers.

0044-2, Alternatives (A)

The Draft EIS/EIR acknowledges that visual and audible disturbances would result from the presence of gondola infrastructure within the existing Squaw Valley ski resort. Given that the resort is already appreciably developed, it was determined that the development would not constitute an appreciable change to the current setting, and therefore was not identified as an adverse or significant impact.

Similarly, placement of gondola towers along Nose Chutes would not eliminate the ski trail. Gondola infrastructure (and in particular, gondola towers) would be strategically located along rocky outcrops or other unskiable terrain to the greatest extent practicable, which would ensure that skier access along the Nose Chutes run would not be obstructed.

0044

The Squaw Valley mid-station under Alternatives 2 and 3 would be positioned on the southeast side of the main KT22 Saddle, so that it would have a minimal impact on the existing skier route from the top of the KT22 Chair to the Saddle area. To mitigate potential impacts on skier flow originating from the Squaw Valley mid-station (which are expected to be negligible), the area of disturbance associated with mid-station would include potential widening of the existing skier route in the vicinity of the mid-station to increase the run's skier capacity. The area of disturbance associated with construction of the Squaw Valley mid-station under Alternative 4 would include terrain grading to improve skier circulation around the top of KT22. When compared with the existing condition, the terrain enhancements would maintain equal or better access to all of the terrain currently served by the KT22 Chair. The terrain enhancements would also create additional flat space in the area of the Squaw Valley mid-station and ski patrol building for expanded milling and/or congregation space. These terrain enhancements would maintain access to all terrain served by the KT22 Chair (or improve access) and would ensure that installation of the gondola would not lead to increased skier traffic (or safety hazards resulting from skier traffic).

0044

0044-2
cont'd

significantly obstruct the flow of ski traffic for a large portion of the KT terrain. I can't tell how this problem would be managed, but it seems that skiers would either be forced to ski around the mid-station, or possibly under the structure. From the skier perspective, these possibilities are undesirable as direct, unobstructed access to slopes from the top of chairlifts is a hallmark feature of Squaw Valley. Personally, as far as I can tell, it seems that my favorite run would be compromised by this mid-station placement. It is also worth noting that restricting the area skiers have to get from the KT chair to the "Saddle" area, as appears would necessarily occur with the placement of the mid-station where depicted, may be problematic insofar as it would create a zone of high skier density, which may lead to collisions and injuries. In other words, there isn't much space at the top of KT right now and skiers tend to congregate near the patrol shack and unloading area—further restricting the available space would seem to be ill-advised as it would certainly make navigating the area more problematic and potentially result in increased injuries.

0044-3

- The **claims** concerning the ability for the gondola to provide additional uphill capacity at Squaw Valley at certain times seem (I am *not* an engineer) to be **unfounded**. More specifically, claims indicating that the Squaw segment could operate during storm conditions when, for example, the upper mountain is closed need to be reconciled with the following facts: under alternatives 2 & 3 the gondola would run on the unprotected side of the ridge; under alternative 4 the gondola would be highly elevated near the ridgeline in order to pass over the existing KT chair line; gondola cabins present large surface areas, which result in greater wind resistance. The current KT chairlift was intentionally located below (in elevation) the ridgeline extending from the patrol shack to the "Nose" to the "Fingers", in addition to being on the leeward side of the ridge (given the typical storm and wind patterns), so that it could be operated during storm conditions. Combined, these facts all undermine the claim that the Squaw segment of the gondola would be able to operate during storm conditions, especially when KT may not be able to operate (e.g., EIS/EIR 4.1-10). Furthermore, I'll note that the Olympic Lady lift is capable of providing additional uphill capacity to parts of the KT terrain, yet on numerous occasions just in the 2017/18 winter (e.g., Saturday, March 3, 2018) when there were substantial lines for the KT lift (i.e., 30+ minutes) the resort did not run the Olympic Lady chair. If history is any precedent, then it seems the claims concerning additional uphill capacity during limited operations should be considered dubious at best.

0044-4

- Given the acknowledgement that the gondola may contribute to an increase in skier visits, coupled with the fact that during busy periods skier visits already exceed the desired capacity ("CCC") of the resorts (especially Squaw), it seems that the potential for the gondola to further degrade the skier experience by increasing crowds to "uncomfortable" levels should be recognized as an adverse effect.

0044-5

- The potential for increased visitors is problematic beyond the skier experience as well, as anyone who has been subject to the horrendous traffic entering/exiting Olympic Valley during busy winter periods can attest to. In other words, the gondola may exacerbate an already unbearable (literally—I, and countless others, will not go through the area at the affected times) traffic.

Chris Egger

231 Observation Court, Tahoe City

0044-2 cont'd, Alternatives (A)

0044-3, Alternatives (A)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project. It is additionally noted that experienced mountain resort planners and lift equipment engineers developed the gondola alignments for each of the alternatives and factored in appropriate engineering and design considerations (including wind exposure) to ensure each of the alignments would be operable as much of the operating season as possible.

0044-4, Recreation (R1)

As described on page 4.1-10 of the Draft EIS/EIR, a skier visitation and use assessment (Appendix C of the Draft EIS/EIR) was prepared for the project. As stated therein, the project's increased visitation "is not anticipated to adversely affect the guest experience or lead to substantial deterioration of any ski area facilities because existing guest service facilities at Alpine Meadows and Squaw Valley are sufficient to support this increase in use." As it relates to the Comfortable Carrying Capacity (CCC), the CCC of a resort is used as a planning figure rather than the "desired capacity" as expressed by the commenter. CCC is a planning figure only and does not represent a regulatory cap on visitation. CCC is used to ensure that capacities are balanced across the resort's facilities and are sufficient to meet anticipated demand. By design, any resort will exceed the CCC numerous days throughout the winter season. Please refer to the "Comfortable Carrying Capacity" discussion contained within Section 4.1.1.1 of the Final EIS/EIR for further details on CCC and how it is applied for the analysis. In addition, Appendix C of the Final EIS/EIR provides additional detail on this subject.

0044-5, Transportation and Circulation/Traffic and Parking (T&C/T&P)

0044

The potential for the proposed gondola to result in increased vehicle trips is addressed in Draft EIS/EIR Section 4.7, "Transportation and Circulation." No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0045

Shirlee Herrington

From: Jill Ehring <jillehring@yahoo.com>
Sent: Wednesday, May 23, 2018 10:10 PM
To: Placer County Environmental Coordination Services
Subject: Gondola

0045-1

I think it is extremely important to recognize that the gondola represents more than just a means of transporting skiers back and forth from Squaw to Alpine. The Alpine area is secluded and has a long history of mud and rock slides, fires and avalanches. To have a secondary escape route via a gondola would be beneficial as well as a viable emergency alternative route of exit for residence and visitors year round. This would not only prevent potential loss of life but would decrease impact on the environment because of reduced traffic and rescue resources.

Jill Ehring

Sent from my iPhone

0045-1, Opinion (O1)

Emergency evacuation is addressed in Section 4.6, "Public Safety," of the Draft EIS/EIR. As described on page 4.6-13, the applicant will be required to prepare an Emergency Preparedness and Evacuation Plan (EPEP) to provide guidance and procedures in the unlikely event of an emergency requiring evacuation. Also, see PRM HAZ-11 in Appendix B of the Draft EIS/EIR.

Will Hollo

From: Bryan Elliott (DEN) <belliot@alterramtnco.com>
Sent: Monday, June 11, 2018 3:31 PM
To: 'comments@squawalpinegondola-eis.com'; cdraecs@placer.ca.gov
Subject: Comments on SVAM B2B Gondola Draft EIS/EIR
Attachments: Gazex Comment Letter .pdf

0046-1, Other (O2)

The attachment referred to in this comment is included as comment letter 0175 in this Final EIS/EIR. See response to comment letter 0175.

0046-1 | Attached please find comments on the Base-to-Base Gondola Draft EIS/EIR on behalf of Squaw Valley | Alpine Meadows.



BRYAN ELLIOTT
CHIEF DEVELOPMENT OFFICER
ALTERRA MOUNTAIN COMPANY
P 303.749.8381 \ C 303.589.1545
ALTERRAMTNC.COM

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0047

June 7, 2018

To: Placer County Planning Commissioners

Re: Gondola proposal at Squaw Valley

- 0047-1 | This project lacks in cost to benefit. No projects should be allowed that increase ADT until the traffic situation is fixed. No additional traffic is tolerable in the Highway 89 corridor in the winter. The exurbanite cost of the gondola does nothing for the traffic situation and those funds could be better used to improve existing infrastructure on the mountain as well as providing for improved transportation such as: providing a local shuttle service in both Alpine Meadows and Squaw Valley that would reduce vehicular traffic instead of a gondola that doesn't do much but increase skier visits for a few years, will run only a few months a year (provided climate change doesn't continue to worsen), and will likely be on wind hold a significant number of days during the few month usage.
- 0047-2 | Additionally, the gondola will have visual negative impacts and parallel abandoned towers that have been in place on Troy Caldwell's property for too many years. It is too close in proximity to the pristine five lakes wilderness. There aren't enough rendering showing how the gondola alternatives will look from Squaw Valley.
- 0047-3 | A recent mud slide in the area of the proposed alternatives should trigger more extensive soils investigations before moving forward with the project.
- 0047-4 | The gondola requires rezoning which should not be approved. Erosion of zoning is a slippery slope. Zoning is zoning for a reason or what's the point zoning.
- 0047-5 | Gas X Avalanche Control:
The gas x avalanche control devices are causing noise problems in both Squaw Valley and Alpine Meadows. The explosions are vastly louder than hand explosives and shake homes and rattle windows. Studies should be made before installing any more. Additionally, they are unsightly and should be painted or somehow made to blend better into the environment.
- No alternative makes good sense. There is no improvement to traffic and doesn't fit into the pristine mountain environment that tourist and locals alike come to enjoy.

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0047-1, Opinion (O1)

The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIS/EIR. The Forest Supervisor for the TNF and the Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

0047-2, Visual Resources (VR)

The existing gondola towers of the "KT South" chairlift are on the privately owned Caldwell property and are therefore beyond the scope of this analysis. Experiential impacts that would occur as a result of proximity of gondola infrastructure to the Five Lakes Trail, the Five Lakes, and the National Forest System-GCW are analyzed in Sections 4.1, "Recreation," 4.2, "Visual Resources," and 4.3, "Wilderness."

The 21 visual simulations created for each alternative allow for a qualitative analysis of the visual changes that are anticipated to occur with implementation of any of the action alternatives from a feasible selection (16) of representative locations. The objective of creating visual simulations is to characterize the appearance of the action alternatives if constructed, rather than to provide a comprehensive view from all possible locations in the project area; therefore, not all locations could be simulated for the purposes of this EIS/EIR. Highly frequented or prominent public areas, visually sensitive vistas, and areas with a high volume/frequency of viewers were selected for simulation. To account for the visual impacts that may occur outside of the immediate project area, a viewshed analysis of the regional visibility of the project was conducted. The viewshed analysis provides a quantitative assessment of the visual impacts associated with the project using the best available data at the time of analysis. For additional information, refer to Visual Resources Analysis Methods discussed in EIS/EIR section 4.2.2.

0047-3, Soils/Geology/Seismicity (SGS)

Potential impacts related to soils are addressed in Section 4.16, "Soils, Geology, and Seismicity," in the Draft EIS/EIR. The following topics are addressed therein: mass wasting events including landslides, debris flows, and rock fall (Impact

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4.16-1); avalanches (Impact 4.16-2); soil limitations that could produce instability, structural damage, or risks of injury (Impact 4.16-3); and erosion (Impact 4.16-4). RPMs and mitigation measures are identified, where appropriate, that require development of a rock blasting plan to, in part, minimize the potential for blasting to trigger mass wasting; prevent erosion and ground disturbance during wet conditions; prevent construction activities on slopes that show signs of instability; and stabilize soils after construction is complete. Engineering studies identified as a requirement of project design will incorporate any available existing relevant data, including any recent mudslide or mass wasting events. All soils, geology, and seismicity impacts, under all action alternatives, are less than significant under CEQA, either prior to, or after consideration of RPMs and Mitigation Measures. All impacts are mitigated under NEPA.

0047-4, Land Use (LU)

The project requires approval from Placer County for a rezone to accommodate the Alpine Meadows base terminal (from Neighborhood Commercial to Open Space). This is discussed in the Draft EIS/EIR in Section 4.4, "Land Use," under Impact 4.4-1. No specific issues related to the content, analysis, or conclusions in the Draft EIS/EIR are raised in this comment. No further response is warranted.

0047-5, Noise (N)

The Gazex avalanche mitigation system was included as part of all action alternatives as presented in the Draft EIS/EIR. However, since publication of the Draft EIS/EIR, the Gazex avalanche mitigation system has been removed as a component of any of the action alternatives for this project. See the Master Response on this topic in Section 1.8, "Master Responses," for more information on the removal of Gazex from the project.